FILE COPY

Hazardous Waste

COMMONWEALTH of VIRGINIA

James S. Gilmore, III
Governor

John Paul Woodley, Jr.
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
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http://www.deq.state.va.us

Dennis H. Treacy
Director

(804) 698-4000
1-800-592-5482

DIVISION OF WASTE PROGRAM COORDINATION
OFFICE OF WASTE PERMITTING

August 27, 2001 Most recent File

Kenneth Bartle, Ph.D
Senior Compliance Manager
Clean Harbors Environmental Services, Inc.
1501 Washington Street
P.O. Box 859048
Braintree, MA 02185-9048

RE: Clean Harbors Environmental Services, Inc.
EPA ID No. VAD988175055
RCRA Part B Permit Application Withdrawal

Dear Mr. Bartle:

The purpose of this letter is to acknowledge your correspondence dated June 22, 2001, which was received on June 25, 2001. Your correspondence stated that the closure of the secondary containment structure resulted in the closure of the last of the operational areas and/or pieces of equipment associated with the RCRA Part B permit application.

Since all operational areas and/or pieces of equipment associated with this RCRA Part B permit application have achieved clean closure, the RCRA Part B permit application is withdrawn. Processing of the permit application will be terminated.

If you have any questions regarding the information contained in this letter, please contact me at (804) 698-4125 or macampbell@deq.state.va.us.

Sincerely,

Mark A. Campbell
Environmental Engineer Senior

c: DEQ - Debra Miller, OWP
DEQ - Arthur Kapell, OWP
DEQ - James Golden, PRO

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June 1, 2001

Mr. Gary Young
Waste Processing Activities
Clean Harbors Environmental Services, Inc.
7515 Harvest Road
Prince George, Virginia 23875

RE: Clean Harbors Environmental Services, Inc.
EPA ID #VAD988175055
Secondary Containment Structure Closure Verification

Dear Mr. Young:

On August 31, 2000 and April 3, 2001, Clean Harbors Environmental Services, Inc., submitted the required closure certifications and report for the closure of its hazardous waste container storage area to the Virginia Department of Environmental Quality [DEQ]. The closure report for these units was submitted in accordance with the Department's comments regarding the risk assessment. Additionally, on June 28, 2000, the closure of the Secondary Containment Structure was verified by Shawn Davis, Environmental Inspector Senior, of the DEQ. The result of the closure verification inspection, and the submitted information have been reviewed.

Based on this closure verification inspection, the closure certifications, and the closure report, clean closure to a residential risk-based determination was achieved for the Secondary Containment Structure for all hazardous constituents. Therefore, the DEQ concurs that final clean closure for this Secondary Containment Structure has been achieved. Please note, however, that the U.S. Environmental Protection Agency retains the authority to address possible corrective action of continuing releases pursuant to the Hazardous and Solid Waste Amendments of RCRA, 1984.

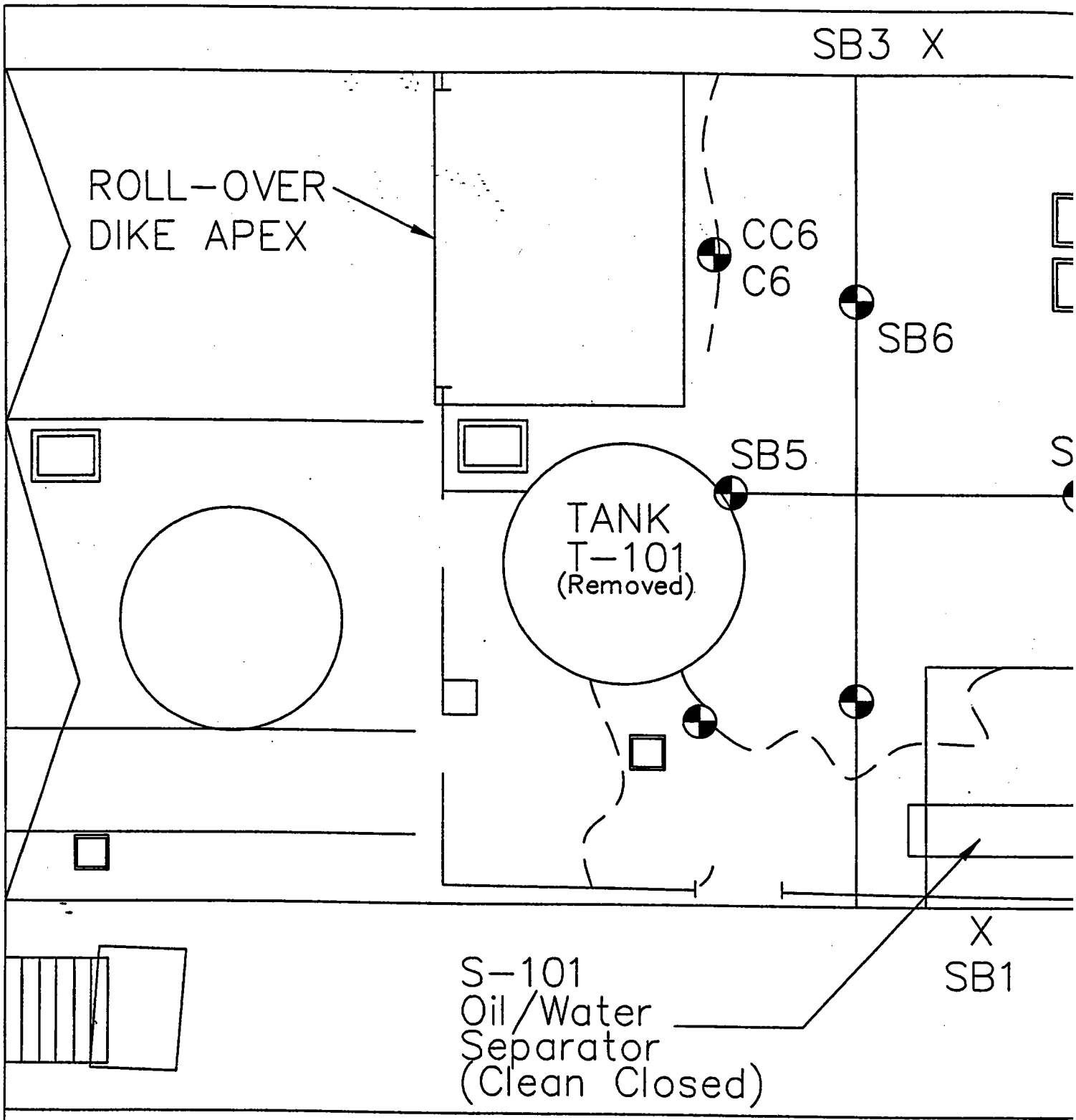


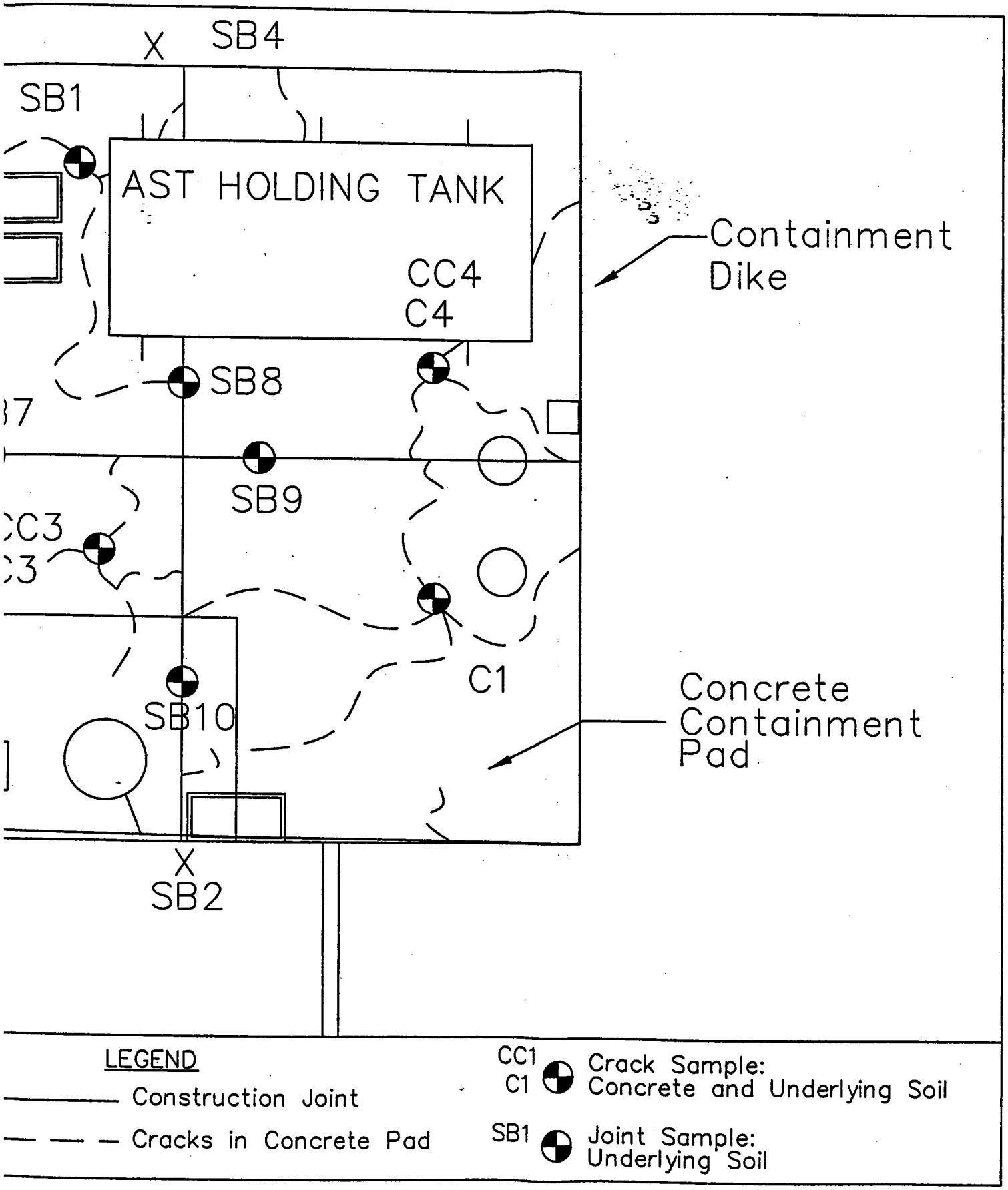
FIGURE 3

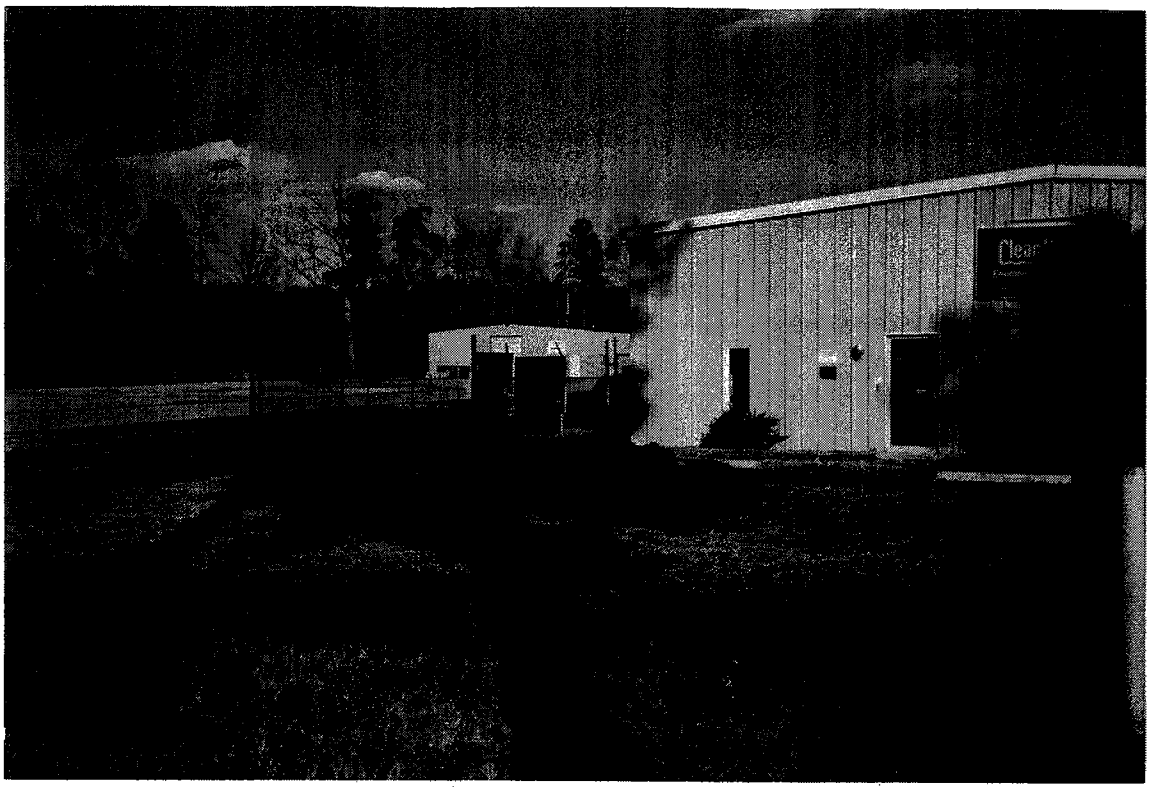
Approximate Scale: 1"=25'-0"

CONTAINMENT SAMPLING LOCATION
HWMN CLOSURE REPORT

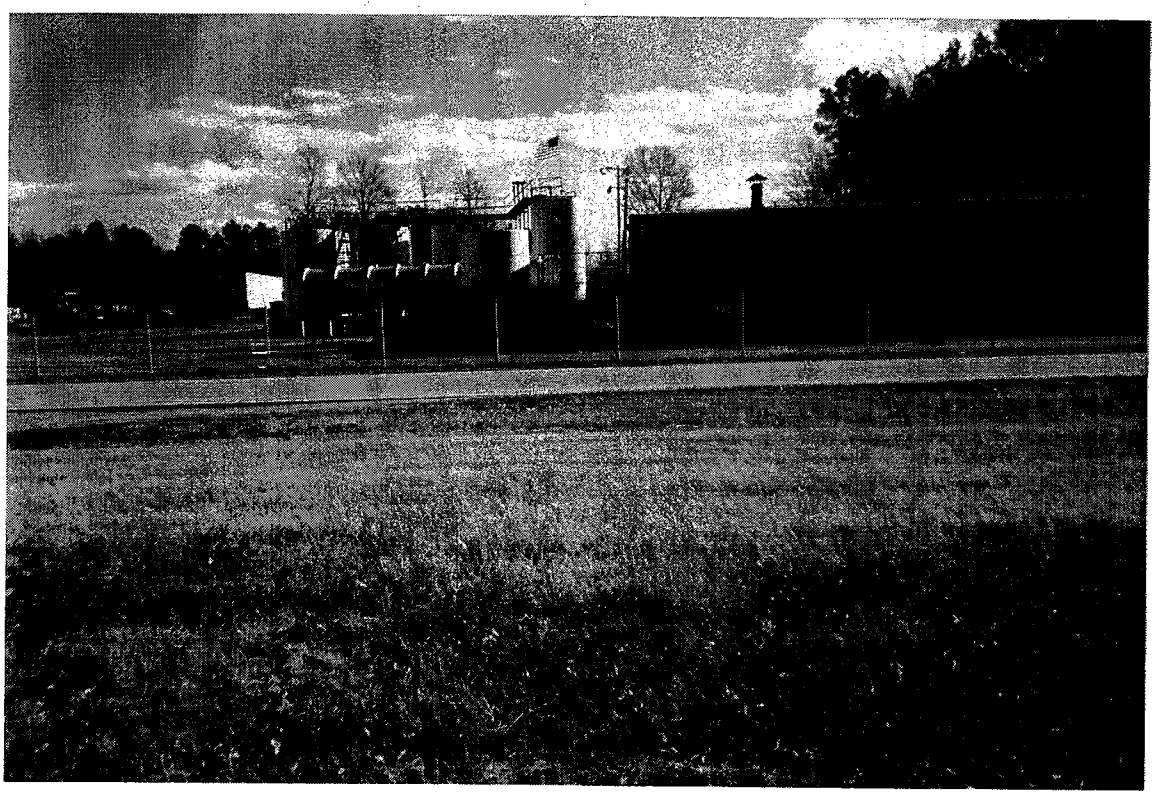
CLEAN HARBORS, INC.
PRINCE GEORGE, VIRGINIA

URS
Dames & Moore


SB4
SB1
AST HOLDING TANK
CC4
C4
Containment
Dike
SB8
SB9
C1
Concrete
Containment
Pad
SB10
SB2
LEGEND
Construction Joint
Cracks in Concrete Pad
CC1
C1
Crack Sample:
Concrete and Underlying Soil
SB1
Joint Sample:
Underlying Soil

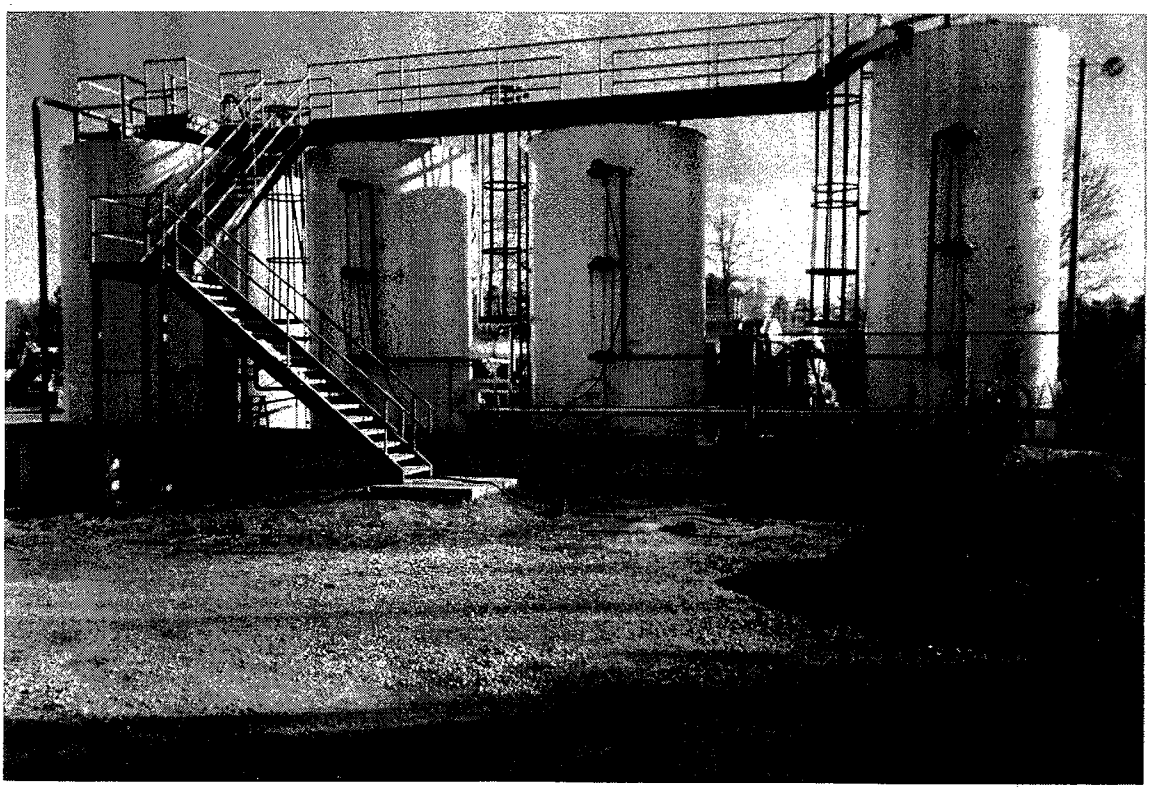


VIEW: NORTHEAST
FRONT OF OFFICE BUILDING AND FRONT GATE

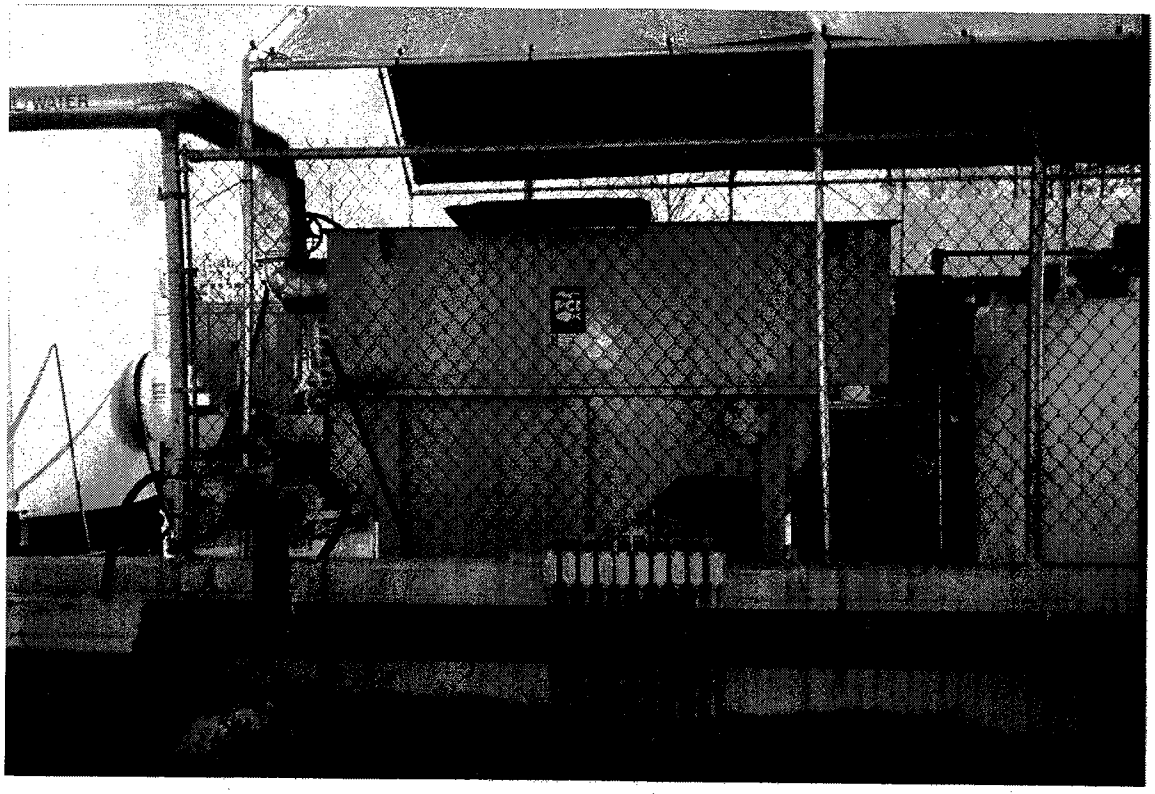


VIEW: SOUTH
TANK FARM AND OFFICE BUILDING (HARVEST ROAD IN FOREGROUND)

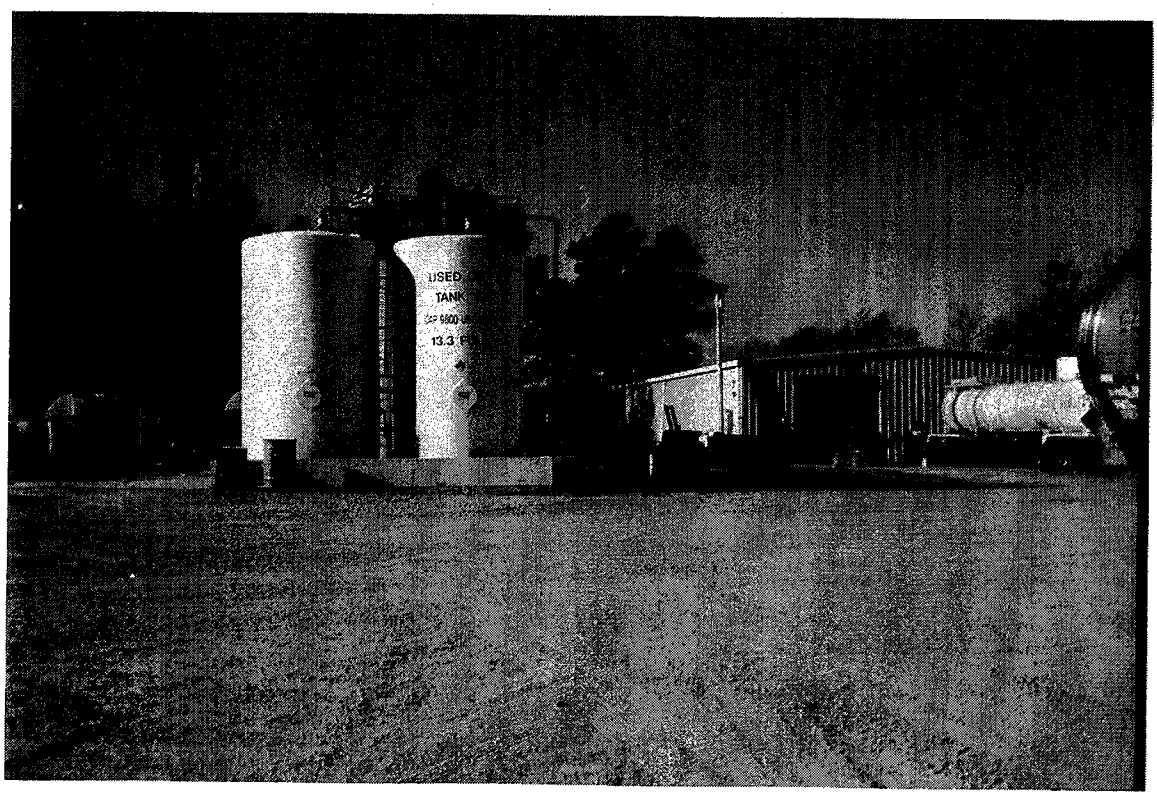
VIEW: SOUTH
TANK FARM



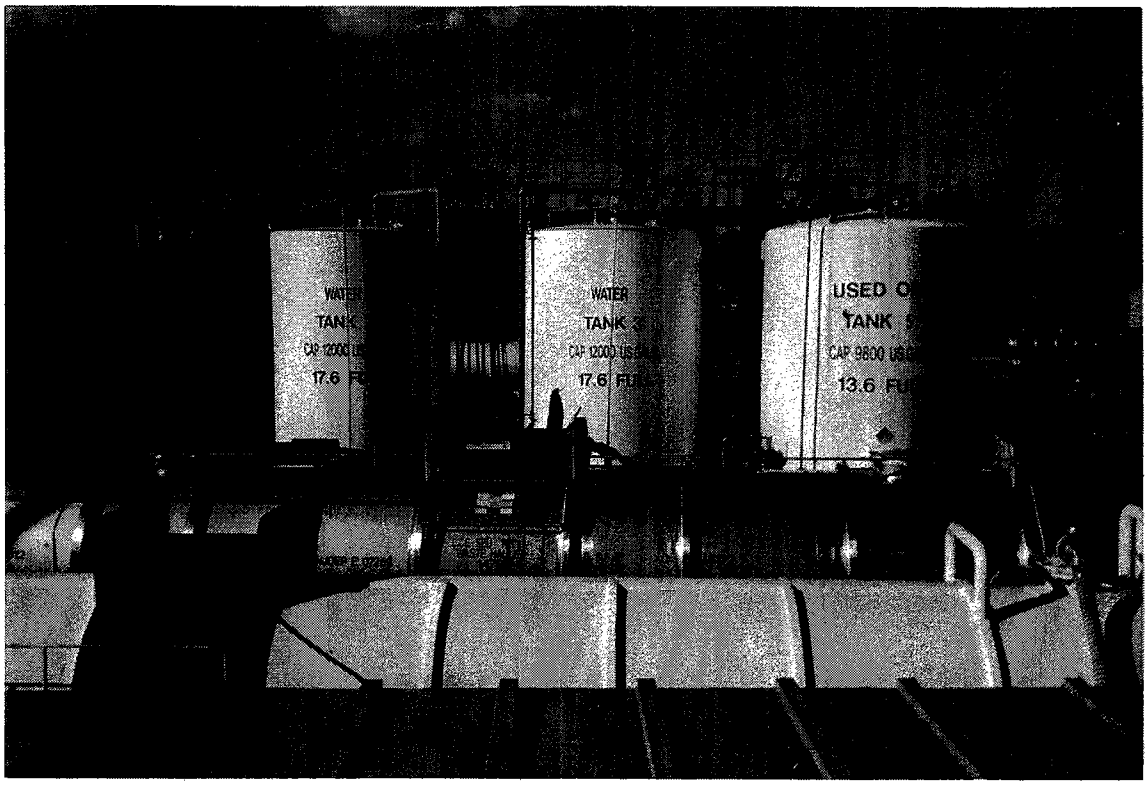
VIEW: SOUTH
TANK FARM



VIEW: SOUTH
TANK FARM SHOWING OIL/WATER SEPARATOR AND EFFLUENT TANK

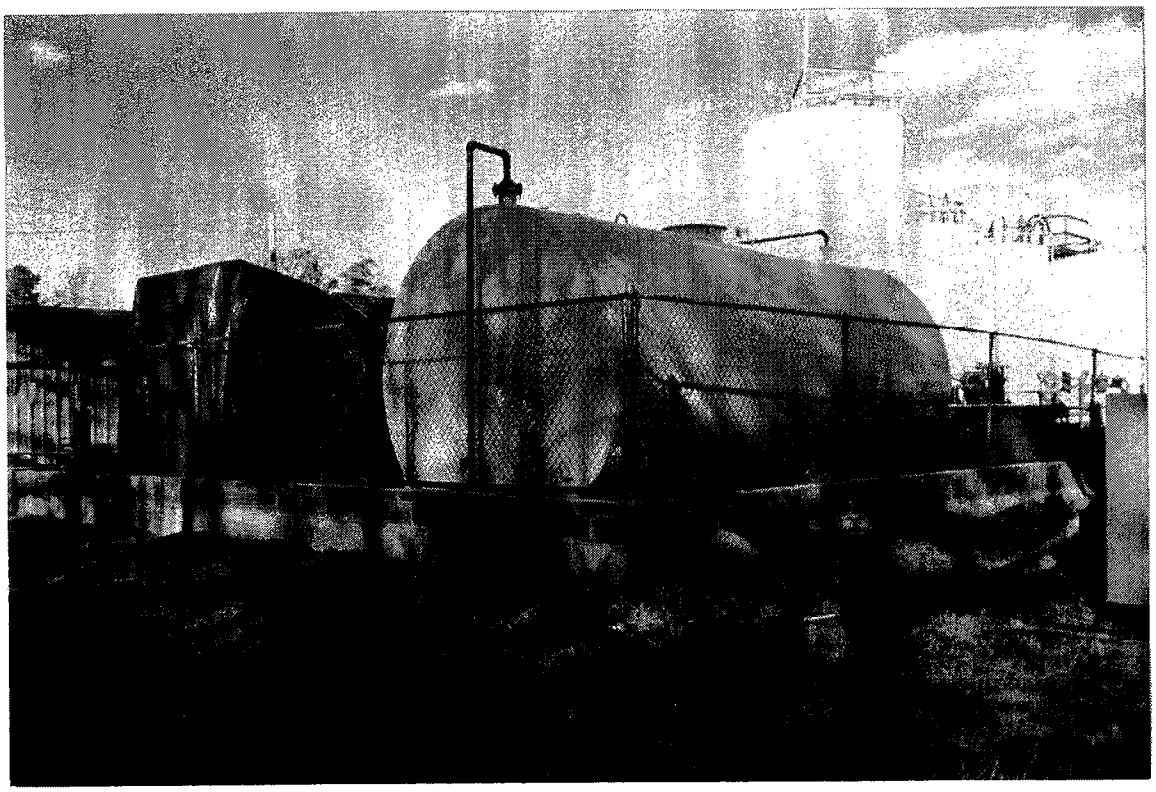


VIEW: WEST
TANK FARM AND OFFICE BUILDING



VIEW: NORTH
TANK FARM

VIEW: NORTH
TANK FARM



VIEW: EAST
TREATED WASTEWATER TANK

Rec'd 1/3/01 JC

COMMONWEALTH of VIRGINIA

James S. Gilmore, III
Governor

John Paul Woodley, Jr.
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
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Dennis H. Treacy
Director

(804) 698-4000
1-800-592-5482

December 20, 2000

Peter W. Egan
Corporate Compliance Manager
Clean Harbors Environmental Services, Inc.
1501 Washington Street
P.O. Box 850327
Braintree, MA 02185-0327

RE: Clean Harbors Environmental Systems, Inc. (CHESI)
Interim Status Units Closure Report
EPA ID VAD988175055

Dear Mr. Egan:

On November 13, 2000, the Department of Environmental Quality (DEQ) received the justifying information regarding the location of the concrete sample, C1, for the facility's interim status units' secondary containment system closure. The DEQ has reviewed this justification, along with the previously submitted closure report.

Based on the information provided, additional information and details are required prior to DEQ verification approval of the secondary containment unit closure. The comments that that will need to be addressed are:

1. The DEQ has determined that the actual location of the crack sampling, C1, is not appropriate. The original location, as noted in the closure report, was chosen as an intersection point of two cracks [see Figure 3 of the closure report]. During the closure inspection performed by Shawn Davis of the DEQ's Piedmont Regional Office, it was noted that the actual location was not at this intersection point. The location actually sampled was along only one of the intersecting cracks. Therefore, the other crack has not been sampled and, per the approved closure plan, requires sampling. Therefore, data for this "missed" crack is necessary as part of the closure.

2. Per Appendix A, Section 2 of the approved closure plan:
"As a part of the Risk Exposure and Analysis Modeling System (REAMS) evaluation, fate and transport modeling is conducted to demonstrate that the residual soil concentrations of contaminants of concern would not result in contamination of other environmental media of concern including the groundwater underneath the closure unit."
Based on review of the closure report's risk assessment analysis, this modeling has not been submitted. Please submit the modeling as required per the approved

closure plan. Please note, the action level for lead is 15 µg/L in groundwater and 400 mg/kg in soil. However, the RCRA lead action level for soil does not provide a clear direction on fate and transport evaluations. One way to address this situation is by using the fate and transport modeling conducted for other inorganics. In cases of shallow groundwater [defined by seasonal low groundwater level], the facility may use a partitioning equation to estimate concentration and compare it to the groundwater action level.

Please review these comments and revise the closure report to include the necessary information. It there are any questions, please contact me via my Internet E-mail address at damiller@deq.state.va.us or at (804) 698-4206.

Sincerely,

Debra A. Miller

Debra A. Miller
Environmental Engineer Consultant
Office of Waste Permitting

cc: Joanne Cassidy, EPA [3WC21]
Moe Habibi, DEQ-PRO
Shawn Davis, DEQ-PRO
Artie Kappel, DEQ
Christian Braun, DEQ
Sanjay Thirungari, DEQ

Rec'd 4/6/00 JR

COMMONWEALTH of VIRGINIA

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Dennis H. Treacy
Director

(804) 698-4000
1-800-592-5482

March 30, 2000

Mr. Sean R. Devine
Corporate Compliance Manager
Clean Harbors Environmental Services, Inc.
1501 Washington Street
P.O. Box 850327
Braintree, MA 02185-0327

RE: Clean Harbors Facility
Prince George, Virginia
EPA ID #VAD 988 175 055
Partial Closure for T-101 and Oil/Water Separator
Closure Verification

Dear Mr. Devine:

On February 7, 2000, Clean Harbors Environmental Services, Inc. submitted the required closure certifications and report for the partial closure of its hazardous waste management units to the Virginia Department of Environmental Quality [DEQ]. The closure report for these units was submitted in accordance with the approved closure plan. On March 7, 2000, the closure of the tank and oil/water separator area was verified. This closure verification inspection was performed by Debra A. Miller, Environmental Engineer Senior, and Moe Habibi, Regional Waste Compliance Manager, of the DEQ. At this time, the closure report and certifications have been reviewed.

Based on this closure verification inspection, the closure certifications, and the closure report, clean closure was achieved for the interim status hazardous waste tank, T-101, and the oil/water separator. However, closure of these units' secondary containment system is still being pursued by Clean Harbors. At this time, the DEQ concurs that the clean closures for the tank and the oil/water separator have been achieved. The tank system was removed and disposed as hazardous waste, and the oil/water separator was decontaminated per the approved closure plan.

Please note, however, that the U.S. Environmental Protection Agency retains the authority to address possible corrective action of continuing releases pursuant to the Hazardous and Solid Waste Amendments of 1984.

If you have any questions regarding this letter, please contact Debra A. Miller, Environmental Engineer Senior, of my staff at (804) 698-4206.

Very truly yours,

Leslie A Romanchik

for Dennis H. Treacy

c: Joanne T. Cassidy, EPA Region 3 [3WC21]
Steve Frazier - DEQ
Melissa Porterfield- DEQ
Rick Weeks – DEQ/PRO
Central Hazardous Waste File

WP00-0084
WP00-0162

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COMMONWEALTH of VIRGINIA

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John Paul Woodley, Jr.
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Director

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September 21, 1999

Peter W. Egan
Corporate Compliance Manager
Clean Harbors Environmental Services, Inc.
P.O. Box 850327
Braintree, MA 02185-0327

RE: Clean Harbors Closure Plan
Prince George, VA
EPA ID Number VAD988175055

Dear Mr. Egan:

The Clean Harbors Environmental Services, Inc., [CHESI] facility in Prince George, Virginia, is an interim status hazardous waste storage and treatment facility. The facility currently has interim status for its hazardous waste storage tank and the oil/water separator. In 1998, EPA made a policy decision, without an appropriate rulemaking, that a wastewater treatment facility can qualify as a designated facility under the federal regulations, as long as it continues to meet the definition of a wastewater treatment unit in 40 CFR 260.10, obtains an EPA Identification number, and follows the applicable hazardous waste manifest instructions. Therefore, EPA determined that no permitting requirements are applicable to these facilities. Virginia does not necessarily agree with EPA's policy decision, and has sought clarification from EPA HQ on this issue. Until a clarification is provided, DEQ believes that since the storage tank and the oil/water separator held interim status and the facility does not intend to pursue permitting, closure per the VHWMR will be necessary.

A closure plan was submitted to the Department of Environmental Quality [DEQ] and was advertised in the *Richmond Times Dispatch* on July 16, 1999, in accordance with the requirements of 9 VAC 20-60-265.112.d.(4). The closure plan has been modified by the Department and is, by this letter, approved.

As provided in Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date of service of this decision to initiate an appeal by filing a notice of appeal with:

Dennis H. Treacy, Director
Virginia Department of Environmental Quality
629 East Main Street
P.O. Box 10009
Richmond, Virginia 23240-0009

In the event that this decision is served to you by mail, the date of service will be calculated as three days after the postmark date. Please refer to Part Two A of the Rules of the Supreme Court of Virginia, which describes the required content of the Notice of Appeal, including specifications of the Circuit Court to which the appeal is taken, and additional requirements concerning appeals from decisions of administrative agents.

If you should have any questions concerning this matter, please contact Debra Miller, Environmental Engineer Senior, of my staff at (804) 698-4206.

Very truly yours,

Leslie A. Romanchik

for Dennis H. Treacy

Attachment
cc: Robert Greaves, EPA Region III
Claire Ballard, DEQ (w/out Attachment)
Melissa Porterfield, DEQ (w/out Attachment)
Moe Habibi, DEQ-PRO
Central Office Hazardous Waste Files

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL SERVICE DIVISION
OFFICE OF WASTE PERMITTING

APRIL 15, 1998

FAX FAX FAX FACSIMILE FAX FAX FAX

Total Pages 6 (including coversheet)

TO:	Debbie Goldblum
FAX:	215-566-3113
SUBJ:	**SWMU/Release Info from Part B**
FROM:	Debra A. Miller Environmental Engineer Senior
PHONE:	(804) 698-4206
FAX:	(804) 698-4234

I am having the appendices copies and sent to you FedEx.

FACSIMILE COPY - PLEASE DELIVER ASAP

SECTION J

CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

Corrective Action for Solid Waste Management Units

Table of Contents

Figures

Appendices

1.0 SOLID WASTE MANAGEMENT UNITS

Clean Harbors Environmental Services, Inc. (CHESI) operates the following types of solid waste management units (SWMU's) at its hazardous waste and waste oil facility located at 7515 Harvest Road in Prince George, Virginia:

- Tanks
- Wastewater treatment units
- Container storage units
- Waste handling areas

There are no inactive SWMU's onsite. In addition, the facility has not in the past operated any landfills, surface impoundments, waste piles, land treatment units, incinerators, transfer stations, or waste recycling operations.

1.1 Characterize the Solid Waste Management Units

The SWMU's at CHESI are located in four major areas identified and characterized below. The location of each area/unit is identified on the facility Site Plan, Drawing No. 1415-C-01, which is provided in **Figure J-1**. Topographic features of the site and surrounding area are shown on the "Locus Map" provided as Figure B-1 of the RCRA Part B License Application.

1.1.1 Existing SWMU's

I. Tank Farm & Processing Area - A 100-feet long by 45-feet wide (approximate) concrete-lined containment structure used for hazardous waste/waste oil storage, waste processing, truck loading/offloading, and generator accumulation (e.g., tank cleanout) activities. The tank units and ancillary equipment located within the containment structure are identified as Item Nos. 1 through 17 on Drawing No. 1415-C-01. Design details for the pad and the storage/processing units is provided in Section D of the RCRA Part B Application. The pad and equipment were installed in 1989.

II. Self-Contained Tank - A 10,000 gallon carbon steel storage tank set inside a 36-feet long by 6-feet wide by 6-feet high metal containment basin set on a bed of gravel. The tank is used for storage of non-hazardous treated wastewater, and was installed in 1994. The tank unit is identified as Item No. 18 on Drawing No. 1415-C-01. Design information for this tank unit are included in Section D of the of the RCRA Part B Application.

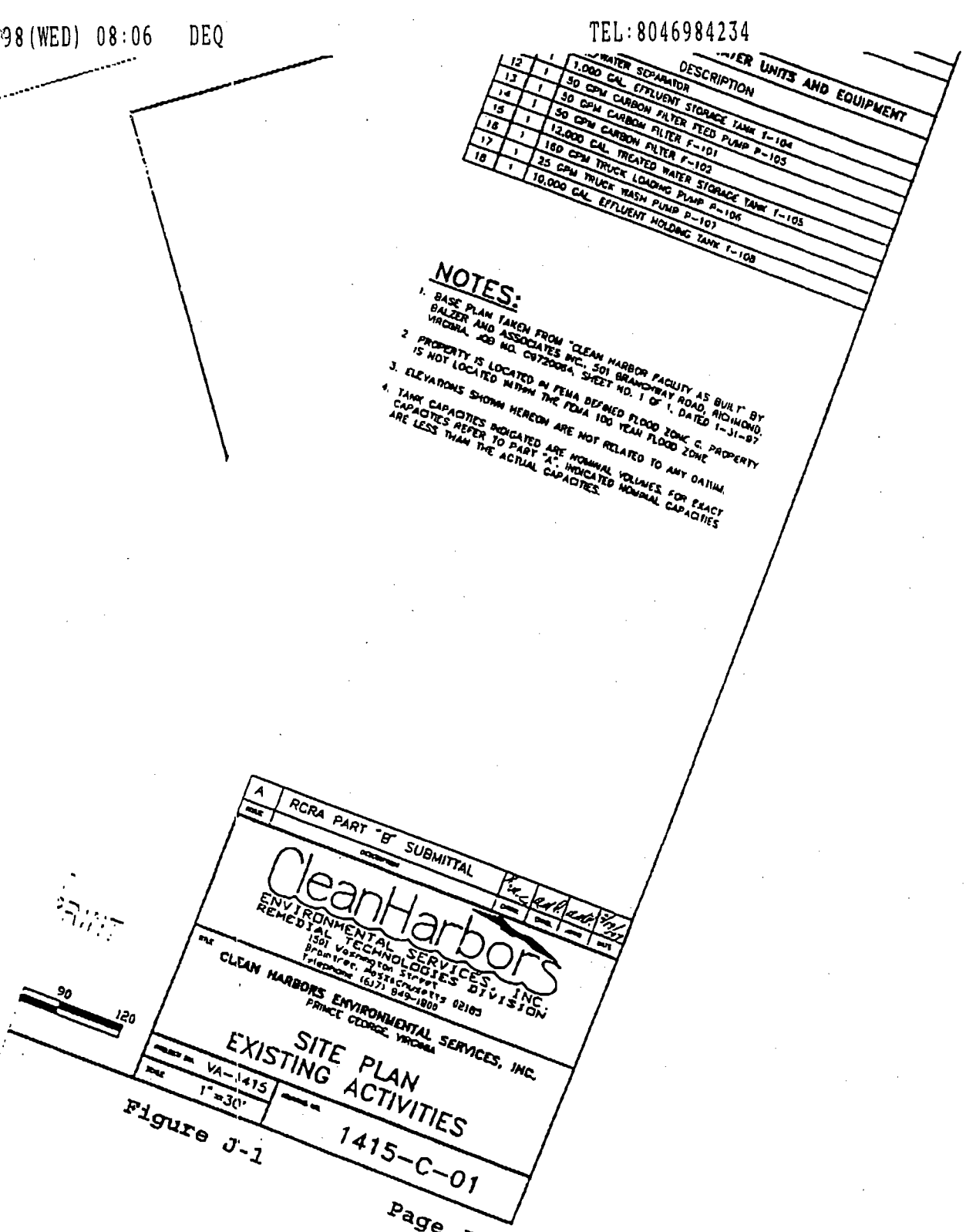
TANK AND OTHER UNITS AND EQUIPMENT
DESCRIPTION
1,000 GAL. EFFLUENT STORAGE TANK T-104
50 GPM CARBON FILTER FEED PUMP P-105
50 GPM CARBON FILTER F-101
12,000 GAL. TREATED WATER STORAGE TANK T-105
150 GPM TRUCK LOADING PUMP P-106
25 GPM TRUCK WASH PUMP P-107
10,000 GAL. EFFLUENT HOLDING TANK T-108
NOTES:
1. BASE PLAN TAKEN FROM "CLEAN HARBOR FACILITY AS BUILT" BY BALZER AND ASSOCIATES INC., 501 BRANCHWAY ROAD, RICHMOND, VIRGINIA. JOB NO. C9720084, SHEET NO. 1 OF 1, DATED 1-31-97
2. PROPERTY IS LOCATED IN FEMA DEFINED FLOOD ZONE C. PROPERTY IS NOT LOCATED WITHIN THE FEMA 100 YEAR FLOOD ZONE
3. ELEVATIONS SHOWN HEREON ARE NOT RELATED TO ANY DATUM.
4. TANK CAPACITIES INDICATED ARE NOMINAL VOLUMES. FOR EXACT CAPACITIES REFER TO PART "A". INDICATED NOMINAL CAPACITIES ARE LESS THAN THE ACTUAL CAPACITIES.
A
RCRA PART "B" SUBMITTAL
CleanHarbors
ENVIRONMENTAL SERVICES, INC.
REMEDIAL TECHNOLOGIES DIVISION
1501 Washington Street
Braintree, Massachusetts 02185
Telephone (617) 849-1800
CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
PRINCE GEORGE, VIRGINIA
SITE PLAN
EXISTING ACTIVITIES
VA-1415
1"=30'
1415-C-01
90
120

Figure J-1

III. Rolloff Storage Area A 64-feet long by 32-feet wide (approximate) concrete-line pad used for the accumulation/ storage of onsite generated non-hazardous residuals (e.g., wastewater treatment sludge) in bulk containers (e.g., rolloffs, intermodal, etc.). The pad is located at the southeast corner of the facility's fenceline as shown on Drawing No. 1415-C-01.

IV. Office/Laboratory - A Hazardous Waste Generator Accumulation Area - Located inside the "1-story metal building", a hazardous waste satellite/accumulation area for wastes generated by onsite laboratory analysis (e.g., acids, solvents, oils, standards).

1.1.2 Former/Closed SWMU's

I. Tank Farm & Processing Area - Prior to CHESI's acquisition of the facility in 1994, the former owners of the facility (i.e., Chemical Waste Management, Inc., CWM) operated and subsequently closed one (1) 5,000-gallon and one (1) 10,000-gallon aboveground storage tank. CHESI understands that the two tanks were used for hazardous waste and waste oil storage activities, and were located inside the existing containment pad structure. The tanks were removed from service in 1993 by CWM. Following closure, the 5,000-gallon tank was shipped offsite, while the 10,000-gallon tank was placed into non-hazardous waste service as Tank T-107. Tank T-107 is still in use by CHESI. No other information on the 5,000-gallon tank is available.

1.1.3 Proposed SWMU's

I. Tank Farm & Processing Area - Under the proposed RCRA Part B Application, CHESI seeks approval in install and operate two additional filtration units and two additional pumps as part of the hazardous waste/waste oil processing system. The proposed units shall be located within the containment structure and are identified as Item Nos. 19 through 22 on Drawing No. 1415-C-01.

1.2 No Solid Waste Management Units

CHESI is not making a claim that there are no solid waste management units at the site. See Section 1.1 above.

2.0 RELEASES

2.1 Characterize Releases

The following is a list of releases known by CHESI to have occurred from the SWMU's identified above:

Date of Release	Type/Description
12/1/94	14 gallons of non-hazardous used oil released from transport vehicle to non-contained gravel/soil area during vehicle loading procedure. Liquid immediately cleaned up using sorbent materials; contaminated gravel and dirt excavated and shipped offsite for disposal.
1/26/95	15 gallons of non-hazardous used oil released from transport vehicle to non-contained gravel/soil area during vehicle offloading procedure. Liquid immediately cleaned up using sorbent materials; contaminated gravel and dirt excavated and shipped offsite for disposal.
1/22/96	75 gallons of non-hazardous used oil released from transport vehicle to non-contained gravel/soil area during truck to truck liquid transfer procedure. Liquid immediately cleaned up using sorbent materials; contaminated gravel and dirt excavated and shipped offsite for disposal.
6/10/96	100 gallons of non-hazardous used oil released during tank loading procedure. All liquid spilled into concrete secondary containment structure. Liquid immediately vacuumed up, and residuals cleaned from concrete surface using sorbent materials.

None of the above released caused any known damage to vegetation or groundwater, or any known migration of contaminants onsite or offsite. In addition, there are no known public citizen complaints about the facility that could indicate a release.

Since there are no land disposal units at the facility, CHESI is not subject to RCRA groundwater monitoring requirements. Existing soil and groundwater data is limited to information obtained during a private site assessment performed on CHESI's behalf prior to its acquisition of the facility in 1994, and on groundwater quality information developed in conjunction with the facility's use of an onsite groundwater supply well. A copy of the the baseline assessment report is provided in **Appendix J-1**. A copy of available groundwater supply well quality data is provided in **Appendix J-2**. A copy of the available surface soil analytical data is included as **Appendix J-3**.

Enclosed

240460

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources

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Thomas L. Hopkins
Director

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1-800-592-5482

May 19, 1997

Peter Egan
Corporate Compliance Manager
Clean Harbors Environmental Services, Inc.
1501 Washington Street
Braintree, MA 02184-7599

RE: Clean Harbors Facility
Part B Application Completeness Review
EPA ID No. VAD988175055

Dear Mr. Egan:

The Part B Permit Application for Clean Harbor's hazardous waste facility in Prince George, Virginia, has been reviewed. This review was conducted to determine the administrative completeness of the permit application in accordance with the *Virginia Hazardous Waste Management Regulations*, as codified in Title 9 of the *Virginia Administrative Code*, Chapter 60 (9 VAC 20-60-10, et seq.).

Based on information submitted, the permit application is not complete and additional/revised information must be submitted. The following comments will need to be addressed prior to the commencement of the technical review of the application:

1. Section B: The information indicates that Clean Harbors currently holds interim status for the tank storage of 15,000 gallons and treatment of 1,500 gallons per minute. The proposed modifications will increase these values to 43,833 gallons and 3,000 gallons per minute, respectively. This increase is greater than 50% over the interim status capacities, and therefore, will subject the facility to the siting criteria of Article 6 of the *Virginia Waste Management Act* (Act).

   Clean Harbors must obtain a certification of site approval per the procedures of the Act and the *Administrative Procedures for Hazardous Waste Facility Site Certification*, 9 VAC 20-40-20, et seq. Additional requirements are contained in the

Hazardous Waste Facility Siting Criteria, 9 VAC 20-50-20, et seq., and the *Schedule of Fees for Hazardous Waste Site Certification*, 9 VAC 20-20-10, et seq.. Please note that for the siting process, all authority, duty, and responsibility of the referenced Hazardous Waste Facility Siting Council is now the obligation of the Department. As you may be aware, the siting process is a lengthy endeavor. As the facility cannot operate the "new" units without the site certification, Clean Harbors is encouraged to commence the siting process as soon as practical.

2. Section C: No information on laboratory reports for representative waste stream samples was located. In accordance with 9 VAC 20-60-1010.B.2 and 20-60-750.D.1.a, a laboratory report detailing the chemical and physical composition of a representative sample shall be submitted.

3. Section C: The parameters for acceptance of waste are indicated in Tables C-1 and C-2; however, no rationale for these parameters is presented. Please include information regarding the rationale for the chosen parameters which insure the waste will meet the requirements of 9 VAC 20-60-750.D.1.

4. Section C.1.2.1 and Section D: A discussion of the tank assessment report (Appendix D-1) indicates that the facility will not accept D002 (Corrosive) acidic waste until the tanks have been retrofitted with the appropriate corrosion protection system. This is not permissible. The engineering plan for installing the corrosion protection system and its operation shall be included with the permit application. The corrosion protection system is part of the tank system and will be part of the permit. It should be noted that the facility has current interim status for D002 waste, and as the interim status storage tank does not have the proper corrosion protection, no acidic D002 waste should be accepted at this facility.

5. Section C, Tables C-1 and C-2: The indicated boundary limit for lead and benzene is 50,000 ppm. Please note, this is 5% not the 1% listed.

6. Section C.2.11: For treatment facilities, the waste analysis plan must provide procedures for sampling protocols, analytical methods, and frequency of analysis for testing wastes for compliance with land disposal restrictions. Please specify this information in the narrative of the waste analysis plan.

7. Section C.2.11.2.2: Treated characteristic waste that is rendered nonhazardous and is shipped to a nonhazardous solid waste management facility does not require notification under 9 VAC 20-60-1440.G. However, for each shipment of this waste to a nonhazardous solid waste management facility, notification and certifications

per 9 VAC 20-60-1440.I.4 shall be sent to the Director of the Department of Environmental Quality. Please modify this section to include this requirement.

8. Section C.2.2.1: Please correct misspelling for used oil "mistures" to mixtures.

9. Table C-5: References indicate either the 2nd or 3rd edition of the SW-846, *Test Methods for Evaluating Solid Waste*. Please correct this to read the 3rd edition, as amended, only. The most recent promulgated test methods shall be used for all SW-846 analysis.

10. Section C.2.11.1.3: Correct misspelling (resulsts should be results) in paragraph 1. Please note, various misspellings are noted throughout the application.

11. Appendix C-1: Please include a clean copy of the Industrial Sewer Discharge Permit. The submitted copy has hand-written changes that may or may not be true modifications to the permit.

12. Section D: Please provide a description of the feed systems, safety cutoff, spill prevention, bypass systems, and pressure controls for the hazardous waste tanks (Refer to 9 VAC 20-60-1010.K.2(c)).

13. Section D: Please provide the required information for ignitable wastes managed in tanks and include the appropriate demonstration to show protection against ignition (Refer to 9 VAC 20-60-1010.K.2(j)).

14. Section D.2.0: Information regarding Tank T-104 is also needed in Section D. Tank T-104 is the equalization tank prior to carbon filtration system. The process flow diagram indicates that this tank stores hazardous waste; however, the tank currently does not have interim status, which is required. Therefore, Clean Harbors should insure that the Part A is updated to include this unit for interim status, until the permit can be issued.

15. Section D.2.2.3.5 and D.3.1.2: The information regarding the secondary containments for tanks must be included in the Part B application. In accordance with 9 VAC 20-60-830 and 20-60-1010, plans and descriptions of the design, construction, and operation of the secondary containment system shall be included. The assessment of the containment indicates that there are cracks, gaps, and, for Tanks T-102 and T-103, insufficient containment volume. The method of repair and correction shall be included (see Comment #17, also). Additionally, please note that all repairs/modifications for compliance for Tank T-101 need to be

completed immediately. No permit will be issued until the interim status tank meets the current regulatory requirements. Please refer to comment #17 for Tanks T-102 and T-103 requirements.

16. Section D.2.2.3.5 and 3.1.2: Present the engineering calculations that prove the secondary containment units are placed on a foundation that is capable of providing support, resisting pressure gradients above and below the system, and preventing failure due to settlement, compression, or uplift (Refer to 9 VAC 20-60-1010.K.2(g)).

17. Section D.3.1.1 and D.3.1.2: The secondary containment for T-102 and T-103 does not have sufficient capacity per the regulatory requirements, as noted in the assessment report and this section. The specific engineering plans and construction details to modify the current containment pad to meet the regulatory requirements must be included with the Part B Application (Refer to 9 VAC 20-60-830.D.2 and D.3). Please note, these modifications for T-102 and T-103 cannot occur until the siting certification is obtained. Additionally, as the containment capacity does not meet the regulatory requirements, these units cannot be utilized to manage hazardous waste until the modifications are completed.

18. Section D.3: Document how it will be ensured that releases and/or precipitation into the secondary containment area will be removed within 24 hours. Please indicate that the ancillary piping and equipment are inspected daily to insure that releases/leaks are detected and removed within 24 hours (Refer to 9 VAC 20-60-830.D.6.a).

19. Section D: A detailed description of the miscellaneous treatment units (T04 - carbon adsorption units) in accordance with 9 VAC 20-60-1010.K.8 is to be included in the narrative Section D of this application (see Comment #14, also).

20. Section D.5.2.1.1: This section discusses the addition of demulsifiers to the waste stored in the tanks to achieve a precise split of organic/water phases. The mixing would be achieved by using the aerator on the bottom of each tank. However, the diagrams indicate that only Tank T-103 has an air sparging system. Please explain how mixing would occur in Tanks T-101 and T-102.

21. Section D: It is noted that Clean Harbors desires to add waste codes for the hazardous wastes that will be accepted at this facility. Some of the toxic heavy metals are included in this addition; however, it is unclear as to how the treatment process will render the hazardous wastes accepted non-hazardous for the metals. Please provide a description of the treatment process' effectiveness for metals (Refer

to 9 VAC 20-60-1010.K.8).

22. Appendix D-1, Page 2: The first paragraph of the summary indicates that the vents are not installed, as indicated in the proposed design. Please indicate on the proposed drawings, all equipment that is not yet installed but proposed to be installed. Include in the narrative a full description of all proposed equipment to be installed/modified for hazardous waste service.

23. Appendix D-1, Page 3: The assessment report indicates that the tanks do not have corrosion protection. Please refer to comment #4, above.

24. Appendix D-1, Page 6: For the summary of Tank T-104, it indicates that the unit's existing service is nonhazardous waste. However, the existing process flow diagram indicates that hazardous waste from Tank T-101 flows through the oil/water separator and is equalized in Tank T-104 until it is processed for treatment through the carbon adsorption units. This process flow path would require Tank T-104 to be a hazardous waste equalization tank, subject to regulatory requirements. Please refer to comment #14, above.

25. Appendix D-1, Tank Sketches: The upper left-hand corner of sketch for Tank T-101 is not readable. Please provide a better copy.

Please review these comments and submit the requested information within 30 days of receipt of this letter. If additional time is required, please submit a request for extension 10 days prior to the 30-day response date. Additionally, if there are any questions or concerns regarding the above comments or the permit application processing, please contact me at (804) 698-4206.

Sincerely,

Debra A. Miller
Environmental Engineer Senior
Office of Permitting Management

cc: Robert Greaves, EPA III (3HW90)
Lisa Ellis, DEQ-Waste
Claire Ballard, DEQ-Waste
Moe Habibi, DEQ-PRO

1.0 STANDARD INDUSTRIAL CLASSIFICATION

Clean Harbors Environmental Services, Inc. (CHESI) is an interim status hazardous waste storage and treatment facility which operates in accordance with the Virginia hazardous waste management regulations codified at 9 VAC 20-60-10. CHESI's business activities are described by the following Standard Industrial Classification (SIC) code numbers:

5093 - Scrap and Waste Services
4959 - Sanitary Services, NEC

2.0 ACTIVITIES REQUIRING PERMIT

2.1 General Facility Description

CHESI is a RCRA interim status hazardous waste storage and transfer facility located at 7515 Harvest Road, Prince George, Virginia. The site has been used since the late 1980s for the storage and treatment of waste petroleum hydrocarbons. The facility serves a variety of customers, including utilities, petroleum distribution companies, and manufacturing companies who generate spent petroleum contaminated fuel and water mixtures. A locus map showing the facility location is presented in **Figure B-1.** A "Surrounding Area Map" locating the facility relative to nearby roadways is provided on Drawing No. 1415-C-02, included as **Appendix B-1.**

2.1.1 Seismic Considerations

The facility is located in Prince George County, Virginia. This county is not listed in appendix VI of 40 CFR Part 264; accordingly, the facility is in compliance with 40 CFR 264.18(a), as required by 40 CFR 270.14(b)(11)(ii).

2.1.2 Floodplain Considerations

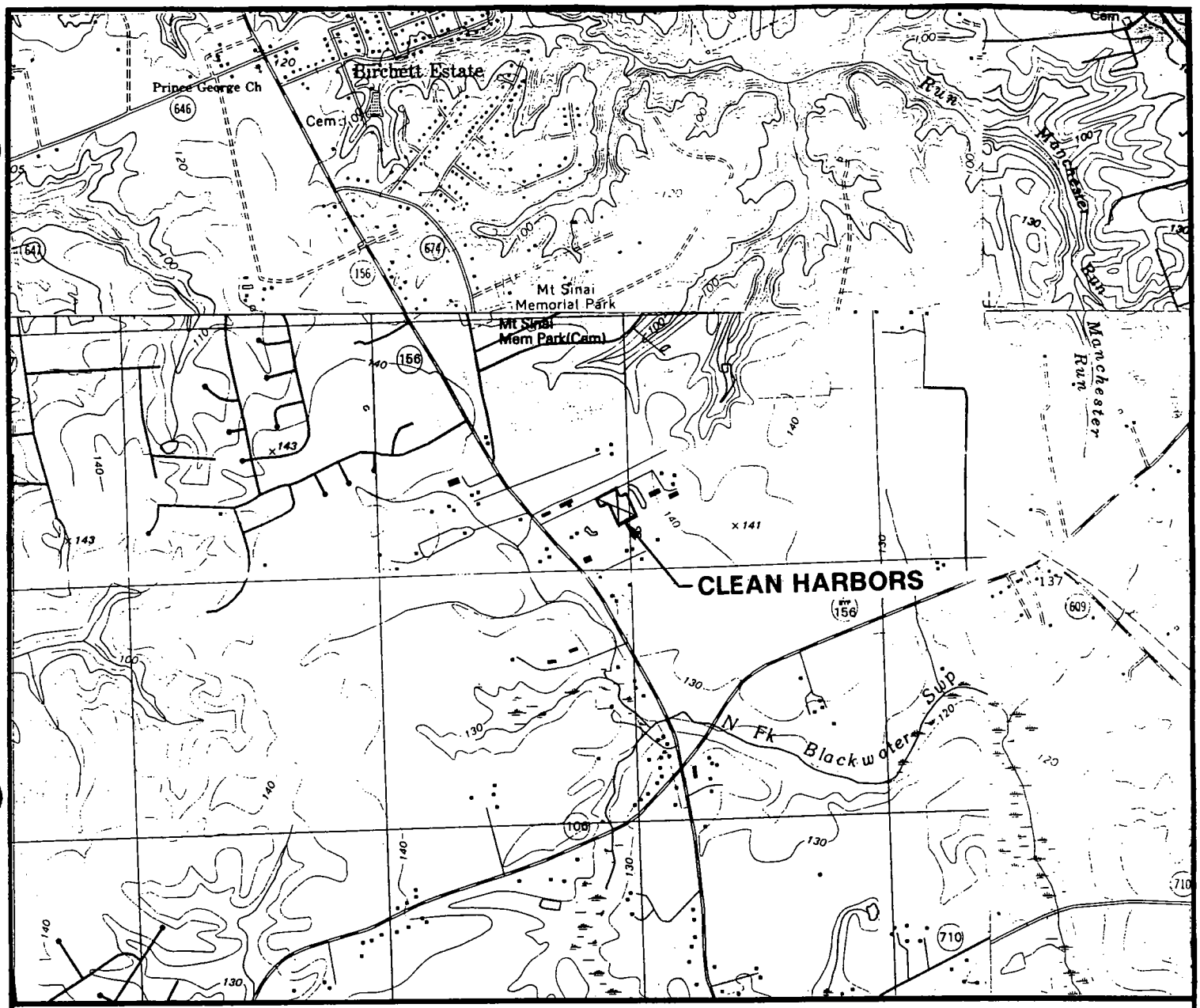
The facility is not located within a 100 year flood plain. The facility is located within a FEMA Flood Zone C. **Appendix B-2** contains a copy of the Federal Insurance Administration Flood Insurance Rate Map, showing the location of the facility relative to the 100 year flood zone. The FEMA Flood Zone C designation is noted on Drawing No. 1415-C-01, "Site Plan, Existing Activities", included as **Appendix B-3**.

2.2 Current/Proposed Hazardous Waste Activities

The hazardous waste activities currently conducted at, or intended for CHESI and the specific regulations governing each activity are categorized into three (3) regulated activities: hazardous waste generator, used oil marketer, and storage/treatment/disposal facility.

2.2.1 Hazardous Waste Generator [9 VAC 20-60-330]

CHESI accumulates and stores hazardous waste subject to 9 VAC 20-60-330 (Regulations Applicable to Generators of Hazardous Waste).



SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET

DATUM IS MEAN LOW WATER

VIRGINIA

QUADRANGLE LOCATION

N

COORDINATES	ISSUE	DESCRIPTION	DRWN.	CHKD.	APPR.	DATE
UTM: 4,124,231mN 298,936mE LONGITUDE : W 77° 16' 02" LATITUDE : N 37° 14' 31"	A	RCRA PART "B" SUBMITTAL	K.M.Co	A.M.L.	A.M.K.	2/19/97

BASE MAP: UNITED STATES GEOLOGICAL SURVEY (USGS) PRINCE GEORGE, WESTOVER, DISPUTANTA NORTH & HOPEWELL, VA QUADRANGLES

CleanHarbors
ENVIRONMENTAL SERVICES, INC.
1501 Washington Street
Braintree, Massachusetts 02185
Telephone (617) 849-1800

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
PRINCE GEORGE, VIRGINIA

LOCUS MAP

PROJECT NO. VA-1415	DWG. NO. 1415-L-01	FIGURE B-1
SCALE AS NOTED		

CHESI generates more than 1,000 kilograms of hazardous waste per month and is classified as a "Large Quantity Generator" (LQG) of hazardous waste.

Specific onsite activities which generate hazardous waste include:

1. Waste filtering and screening - Incoming wastestreams may be processed through a screening filter to remove solids and debris. Solids that are periodically removed from the screening unit are containerized in 55 gallon drums or rolloff containers and shipped to a properly licensed offsite facility for disposal.

   Periodic cleaning of the oil/water separator, filter baskets, carbon treatment units, and tanks, as well as onsite laboratory activities.

2. Maintenance - Small quantities of hazardous waste such as paints, degreasers, and other wastes may be generated during routine cleaning, repair and upkeep activities. The wastes are properly containerized and shipped to an approved offsite facility for disposal.

All of the hazardous wastes generated onsite, including those generated in the storage and handling processes, in accordance with 9 VAC 20-60-330, are either shipped to an approved offsite treatment/ disposal facility within 90 days of generation, or transferred to the Part B licensed storage areas of the facility. CHESI's accumulation and management of these wastes are conducted in compliance with the requirements of 9 VAC 20-60-330 and are exempt from Part B licensing requirements.

2.2.2 Used Oil Marketer Activity [40 CFR Part 279]

CHESI is authorized to conduct specification and off-specification used oil marketer activities in accordance with the requirements of 40 CFR Part 279. CHESI's used oil management and marketer activities are exempt from Part B licensing requirements.

2.2.3 Hazardous Waste Facility [9 VAC 20-60-740]

2.2.3.1 Current Authorization/Activities

CHESI currently operates as an interim status hazardous waste facility. Under interim status authority, CHESI is authorized to store up to 15,000 gallons of hazardous waste (D001, D002, D008, and D018) in above ground storage tanks. CHESI is authorized to treat 1,500 gallons per hour of D001, D002, D008 and D018 hazardous wastes. The treatment process separates, adsorbs and removes waste petroleum products from the aqueous phase of a waste stream using phase separation, neutralization, filtration and carbon adsorption.

The onsite storage of hazardous wastes at CHESI and all related

managerial and operational aspects of the permitted hazardous waste facility not described in Sections 2.2.1 and 2.2.2 above are subject to 9 VAC 20-60-740.

2.2.3.2 Proposed Authorization/Activities

Under this RCRA Part B License Application, CHESI intends to continue accepting from offsite sources waste petroleum liquid, semi-solid, and solid hazardous wastes that are characterized as ignitable (D001), corrosive (D002) and toxic (D008, D018). All liquids will continue to be stored in above ground tanks.

In addition, CHESI intends to permit three (3) additional aboveground storage tanks for the storage of hazardous waste, as well as permit one (1) oil/water separator, one (1) effluent holding tank, and four (4) carbon filter units (See Attachment D - Tank Management Plan). CHESI also intends to add eight (8) additional EPA hazardous waste codes (See Attachment C - Waste Analysis Plan).

Under the proposed Part B License activities, the total hazardous waste storage capacity of the facility will not exceed 43,883 gallons at any time.

2.3 Processes, Structures and Equipment

The active hazardous waste portion of the facility includes a truck loading pad, and a bulk storage/treatment system. There is a building located on the non-active portion of the site which houses administrative offices, the on-site laboratory, and general maintenance equipment and supplies. The existing layout of the facility is shown on the Drawing No. 1415-C-01, "Site Plan, Existing Activities", included as **Appendix B-3**. The propsoed layout of the facility is shown on Drawing No. 1415-C-06, "Site Plan, Existing and Proposed Activities", included as **Appendix B-4**.

The hazardous waste storage/treatment system at the facility consists of four (4) aboveground vertical steel storage tanks, one (1) oil/water separator, and four (4) carbon filters. Each tank is equipped with appropriate instrumentation to monitor product levels and prevent tank overfilling. The hazardous waste system is equipped with four (4), and with associated piping and valves to permit the receipt, storage and transfer of waste between the tanks, bulk transport vehicles, and treatment system. Secondary containment for the tanks and adjacent tanker offloading area is provided by a concrete lined and diked basin. The concrete secondary containment surfaces are coated with a chemical resistant coating appropriate for the materials stored.

CHESI also manages wastes in several tanks which are not subject to RCRA subtitle C permit requirements (i.e., waste oil managed in accordance with 40 CFR Part 279, and non-hazardous treated wastewater). These tanks and associated equipment are identified on Drawing No. 1415-C-01, "Site Plan, Existing Activities", included as **Appendix B-3**, and Drawing No. 1415-C-06, "Site Plan, Existing and Proposed Activities", included as **Appendix B-4**.

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources

Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 10009, Richmond, Virginia 23240
Fax (804) 698-4500 TDD (804) 698-4021
http://www.deq.state.va.us

Thomas L. Hopkins
Director

(804) 698-4000
1-800-592-5482

December 6, 1996

Mr. James R. Doyle
Chemical Waste Management Inc.,
3003 Butterfield Road
Oak Brook, Illinois 60521

Re: Former Chemical Waste Management
Hopewell Facility
EPA ID# VAD988175055

Dear Mr. Doyle:

On November 20, 1996, the above-referenced facility was visited by Khoa Nguyen, a representative of the Virginia Department of Environmental Quality (Department). The closure certification report was submitted by your letter dated August 23, 1996. The inspection and required certifications show that closure for the former 5000-gallon tank and 10000-gallon tank had been performed in accordance with the approved closure plan. The Department hereby approves the closure certification report. Please note, however, that the U.S. Environmental Protection Agency retains the authority to address possible corrective action of continuing releases pursuant to the Hazardous and Solid Waste Amendments of 1984.

If you have any questions regarding this letter, please contact Khoa Nguyen of my staff at (804) 698-4128.

Sincerely,

Leslie A. Romanchik

for Thomas L. Hopkins

TLH/KN

OFFICIAL FILE C

RUST ENVIRONMENT & INFRASTRUCTURE

RUST Environment & Infrastructure Inc.
1029 Technology Park Drive
Glen Allen, VA 23060
Tel. (804) 266-0332 • FAX (804) 266-8841

February 19, 1996

Mr. John Andrews
Senior Project Manager
Chemical Waste Management/AETS
Light Remedial Services Group
3007-C West Clay Street
Richmond, Virginia 23230

Re: Hazardous Waste Aboveground Storage Tank Closure Certification
Clean Harbors - Hopewell Facility, Prince George, Virginia
Rust Environment & Infrastructure Job No. 34680.000

Dear Mr. Andrews:

Rust Environment & Infrastructure (Rust) is pleased to present this closure certification report for a 5,000-gallon and 10,000-gallon aboveground storage tank (AST) at the Clean Harbor - Hopewell facility. The closure activities conducted at the facility under this certification report were performed as a result of remaining closure obligations for the facility by Chemical Waste Management (CWM). The closure certification has been prepared in accordance with the requirements stated in section 9.6.F of the DEQ Hazardous Waste Management Regulations (VR 672-10-1) and the Partial Closure Plan for the facility as prepared by CWM. The Partial Closure Plan, used for the closure certification as approved by the DEQ, is included in Attachment A.

OVERVIEW OF CLOSURE REQUIREMENTS

Section 5.0 of the Partial Closure Plan indicates that a registered professional engineer must provide technical oversight during the closure of the tanks and be prepared to perform inspections of the closed tanks, associated piping, etc. The inspections must determine if:

- All waste has been removed
- All equipment and/or materials scheduled for removal have been removed and delivered to a permitted disposal or reclamation facility

- All waste manifests have been completed for products that were proposed to be transported and disposed in an approved and permitted facility

- All equipment that is not scheduled for removal has been cleaned and decontaminated, and the rinsate from the decontamination process has been analyzed to ensure proper disposal. Equipment used during the closure activities that are not subject to disposal will remain onsite and be used in similar applications

The rinsate generated during the decontamination process will be sampled and analyzed for lead (waste code D008) and benzene (waste code D018) in accordance with EPA's Test Methods for Evaluating Solid Waste, Physical and Chemical Methods (SW-846). Residual liquid waste and rinsate in the tanks will be removed and managed onsite as nonhazardous waste. The tanks were to be cut into manageable pieces, manifested as hazardous waste using the appropriate waste codes, and transported to an approved and permitted disposal facility. It is important to note that the tanks were to be landfilled, regardless of the results of the rinsate analytical data.

SITE VISITS AND INSPECTIONS

A Rust professional engineer visited the facility on November 20, December 4, and December 5, 1995 to oversee closure activities of the 5,000 and 10,000 gallon ASTs in accordance with the approved Partial Closure Plan.

On November 20, 1995, CWM personnel mobilized to the site and began to conduct closure activities on the 5,000 gallon AST used for confined space entry training. The interior of the AST was thoroughly steam-cleaned. During steam-cleaning, the generated rinsate was captured in a vacuum truck operated by CWM. Rinsate samples were collected during steam-cleaning activities. Once all generated liquids in the AST had been recovered by the vacuum truck, CWM personnel began to cut the tank into manageable pieces through use of an acetylene torch. The tank was cut and placed in a 20 cubic yard rolloff container. The rolloff container was to remain onsite until closure activities for the 10,000 gallon AST were completed. The collected residual liquids in the vacuum truck were to be transported and deposited into one of the facility's treated nonhazardous wastewater tanks.

Closure activities resumed at the facility on December 4, 1995 because of difficulties in locating and scheduling the delivery of a temporary tank to be used while the 10,000 gallon AST was being closed. The temporary tank would be used to store any treated wastewater that would normally be stored in the 10,000 AST. Since the contents of the 10,000 gallon AST were nonhazardous, most of the residual liquids were pumped into one of the facility's frac tanks located outside of the secondary containment area. Any remaining residual liquids were vacuum-pumped out of the tank into the CWM vacuum truck. CWM entered the AST to begin steam-cleaning and sampling activities. The

The hazardous waste manifest for the tanks indicates that the tanks were transported to an approved disposal facility. The tanks will be landfilled according to the manifest. The manifest also indicates the appropriate waste codes for lead (D008) and benzene (D018) in accordance with the waste profile, the Partial Closure Plan, and the analytical data.

An additional manifest for nonhazardous material was prepared for the generated rinsate during tank cleaning activities. The manifest indicates that 880 gallons of rinsate was carried by CWM to the Clean Harbors facility. The rinsate was held in the CWM vacuum truck prior to being deposited into a nonhazardous wastewater tank at the Clean Harbors facility. The waste profiles and manifests are included in Attachment C.

The following certification indicates that the closure activities documented in this certification report are in general conformance with the closure criteria specified in the current Partial Closure Plan.

It is important to note that CWM must also execute and submit this closure certification to the DEQ by certified mail within 60 days of the completion of partial closure activities.

CERTIFICATION

I hereby certify that the closure of the 5,000 gallon and 10,000-gallon ASTs at the subject facility have been performed in general accordance with the facility's Partial Closure Plan. This certification is valid pending additional revisions to the Partial Closure Plan after the dates of closure activities indicated in this document. The certification is not valid for revisions to the Partial Closure Plan as a result of additional DEQ review.

CHARLES E. LUCK JR.
Printed Name of Registered Professional Engineer

Charles E. Luck Jr. 2/19/96
Signature of Registered Professional Engineer *Date*

22835 VA.
Registration No. *State*

Dec 18, 1996
Chemical Waste Management/AETS Representative *Date*

8/21/96

COMMONWEALTH OF VIRGINIA
CHARLES E. LUCK, JR.
No. 22835
PROFESSIONAL ENGINEER

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Clean Harbors
CWM

SECTION B

FACILITY DESCRIPTION

Facility Description

Table of Contents

Table of Contents
(continued)

Figures

Tables

Appendices

1.0 STANDARD INDUSTRIAL CLASSIFICATION

Clean Harbors Environmental Services, Inc. (CHESI) is an interim status hazardous waste storage and treatment facility which operates in accordance with the Virginia hazardous waste management regulations codified at 9 VAC 20-60-10. CHESI's business activities are described by the following Standard Industrial Classification (SIC) code numbers:

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2.1 General Facility Description

CHESI is a RCRA interim status hazardous waste storage and transfer facility located at 7515 Harvest Road, Prince George, Virginia. The site has been used since the late 1980s for the storage and treatment of waste petroleum hydrocarbons. The facility serves a variety of customers, including utilities, petroleum distribution companies, and manufacturing companies who generate spent petroleum contaminated fuel and water mixtures. A locus map showing the facility location is presented in **Figure B-1.** A "Surrounding Area Map" locating the facility relative to nearby roadways is provided on Drawing No. 1415-C-02, included as **Appendix B-1.**

2.1.1 Seismic Considerations

The facility is located in Prince George County, Virginia. This county is not listed in appendix VI of 40 CFR Part 264; accordingly, the facility is in compliance with 40 CFR 264.18(a), as required by 40 CFR 270.14(b)(11)(ii).

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The facility is not located within a 100 year flood plain. The facility is located within a FEMA Flood Zone C. **Appendix B-2** contains a copy of the Federal Insurance Administration Flood Insurance Rate Map, showing the location of the facility relative to the 100 year flood zone. The FEMA Flood Zone C designation is noted on Drawing No. 1415-C-01, "Site Plan, Existing Activities", included as **Appendix B-3**.

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The hazardous waste activities currently conducted at, or intended for CHESI and the specific regulations governing each activity are categorized into three (3) regulated activities: hazardous waste generator, used oil marketer, and storage/treatment/disposal facility.

2.2.1 Hazardous Waste Generator [9 VAC 20-60-330]

CHESI accumulates and stores hazardous waste subject to 9 VAC 20-60-330 (Regulations Applicable to Generators of Hazardous Waste).

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All of the hazardous wastes generated onsite, including those generated in the storage and handling processes, in accordance with 9 VAC 20-60-330, are either shipped to an approved offsite treatment/ disposal facility within 90 days of generation, or transferred to the Part B licensed storage areas of the facility. CHESI's accumulation and management of these wastes are conducted in compliance with the requirements of 9 VAC 20-60-330 and are exempt from Part B licensing requirements.

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CHESI is authorized to conduct specification and off-specification used oil marketer activities in accordance with the requirements of 40 CFR Part 279. CHESI's used oil management and marketer activities are exempt from Part B licensing requirements.

2.2.3 Hazardous Waste Facility [9 VAC 20-60-740]

2.2.3.1 Current Authorization/Activities

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The onsite storage of hazardous wastes at CHESI and all related

managerial and operational aspects of the permitted hazardous waste facility not described in Sections 2.2.1 and 2.2.2 above are subject to 9 VAC 20-60-740.

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Under this RCRA Part B License Application, CHESI intends to continue accepting from offsite sources waste petroleum liquid, semi-solid, and solid hazardous wastes that are characterized as ignitable (D001), corrosive (D002) and toxic (D008, D018). All liquids will continue to be stored in above ground tanks.

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CHESI also manages wastes in several tanks which are not subject to RCRA subtitle C permit requirements (i.e., waste oil managed in accordance with 40 CFR Part 279, and non-hazardous treated wastewater). These tanks and associated equipment are identified on Drawing No. 1415-C-01, "Site Plan, Existing Activities", included as **Appendix B-3**, and Drawing No. 1415-C-06, "Site Plan, Existing and Proposed Activities", included as **Appendix B-4**.

2.4 Facility Latitude and Longitude

The facility is situated on a 2.8 acre parcel of land in Forbes Industrial Park. The immediate area is a lightly developed agricultural/residential/industrial region. Forbes Industrial Park is located along Route 156 about twenty miles southeast of Richmond, Virginia. The facility is bordered on the northwest, across Harvest Road, by Virginia Sealing Products; on the southwest by an undeveloped wooded area beyond which are several residences; on the southeast by an open field; and on the northeast by an unnamed surface water body.

The facility is located at latitude 37°15'23" North and longitude 77°16'1" West.

2.5 Drawings and Maps

The location of the facility, and the topographic, land use, natural and cultural features of the site and surrounding area are shown on the maps/drawings listed in **Table B-1**. A copy of each drawing/map is included in the RCRA Part B License Application as noted.

Table B-1

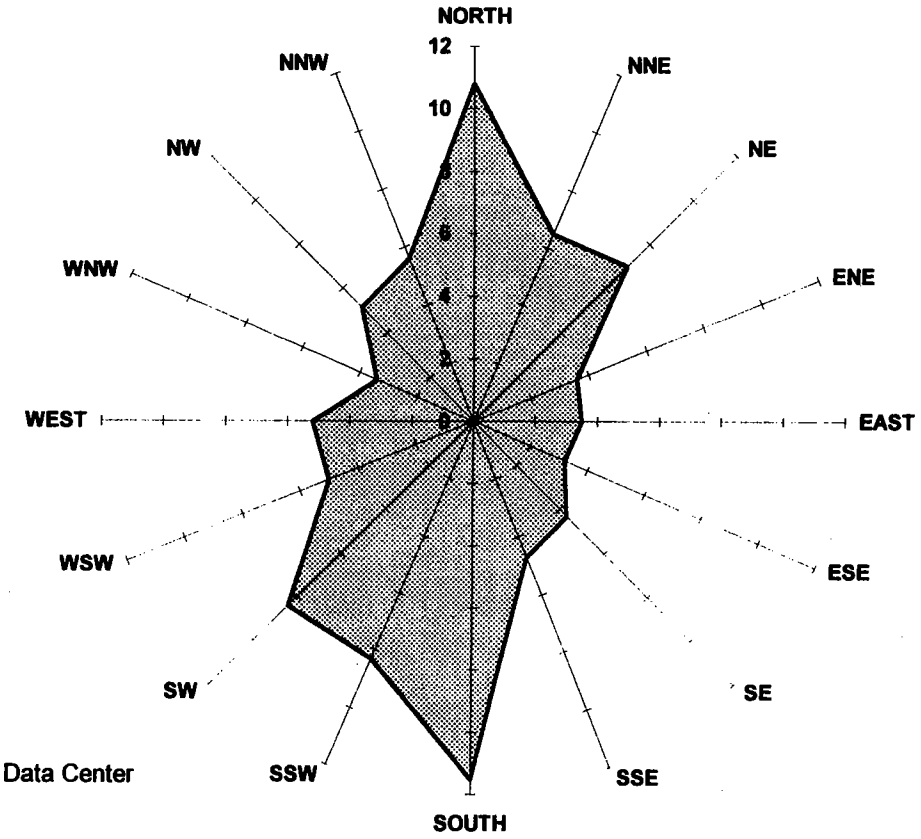
Maps and Drawings

Title	Location in Part B Application
Locus Map	Figure B-1
Wind Rose	Figure B-2
Surrounding Area Map	Appendix B-1
National Flood Insurance Program, Flood Insurance Rate Map, Community Panel Code 510204 0025 A	Appendix B-2
Site Plan, Existing Activities	Appendix B-3
Site Plan, Existing and Proposed Activities	Appendix B-4

These drawings and figures satisfy the requirements for general and topographic maps specified by 9 VAC 20-60-1010 I. A Wind Rose has been submitted as a separate figure, **Figure B-2**.

FIGURE B-2

Wind Rose
Wind Direction, Frequency of Occurrence in Percent, Annually
Richmond, Virginia



Source: NOAA, National Climatic Data Center

2.6 Photographs

Photographs of the facility, detailing all existing hazardous waste management units and facility structures, are included with the RCRA Part A Application Form in Section A.

2.7 Key Management Personnel

Company Officers and other key management personnel involved in the oversight of hazardous waste activities at CHESI include:

- Alan S. McKim -- Chairman and Chief Executive Officer, Clean Harbors, Inc.; Director, Clean Harbors Environmental Services, Inc.
- Brian House -- Vice President of Field Services, CLean Harbors Environmental Services, Inc.
- Paul Ahearn -- Director of Regulatory Affairs, Clean Harbors Environmental Services, Inc.
- Robert Spielvogel -- Director of Health, Safety and Training, Clean Harbors Environmental Services, Inc.
- Scott Day -- General Manager, Oil Recycling Division, Clean Harbors Environmental Services, Inc.
- Gary Young -- Facility General Manager

Resumes reflecting the educational and professional experience of these individuals are included in **Appendix B-5**.

3.0 OWNERSHIP INFORMATION

3.1 Owner/Operator

The mailing address and telephone number of the facility owner/operator are:

Name:	Clean Harbors Environmental Services, Inc.
Address:	7515 Harvest Road Prince George, Virginia 23875
EPA ID No.:	VAD988175055
Telephone:	(804) 452 1818
Contact:	Gary Young, Facility General Manager

The property on which the facility is located is owned by A. A. Forbes.

3.2 Ownership Status

CHESI is a wholly owned subsidiary of Clean Harbors, Inc., a publicly owned Massachusetts corporation with headquarters in

Braintree, Massachusetts.

Clean Harbors, Inc. acquired the CHESI facility located at 7515 Harvest Road, Prince George, VA in September, 1994 from Chemical Waste Management. A copy of the Asset Purchase Agreement demonstrating stock acquisition is included in **Appendix B-6**.

3.3 Indian Lands

No portion of the CHESI hazardous waste facility is located on Indian Lands.

3.4 Permits and Approvals

A list of existing permits and authorities for the facility is presented in **Table B-2**.

3.5 Company Qualifications and Experience

Since its inception in 1981, Clean Harbors, Inc. and its subsidiary companies have provided a wide range of hazardous waste and environmental management services to over 3,000 large and small commercial clients, government agencies, and other hazardous waste management companies. In addition to the facility in Prince George, Virginia, CHI's subsidiaries own and operate:

- Eight hazardous waste treatment, storage, and disposal facilities (TSDFs) in six states;
- One industrial wastewater treatment facility in Cleveland, Ohio;
- A Massachusetts-regulated Class B(3) waste oil recycling facility in Kingston, MA:
- A waste oil recycling facility in South Portland, Maine;
- One hazardous waste transportation company licensed to haul hazardous waste in the United States and Canada;
- One commercial analytical laboratory in Massachusetts.

A detailed desription of CHI's qualifications and experience is included in **Appendix B-7**.

3.6 Financial Information

A copy of CHI's 1996 Annual Report is included in **Appendix B-8**. A copy of CHI's Security and Exchange Commission Form 10-K statement is included in **Appendix B-9**.

3.7 Officers, Directors, and Partners

CHESI is a Massachusetts corporation with offices at 1501 Washington Street, Braintree, Massachusetts 02184. A list of CHESI's corporate officers is provided in **Table B-3**.

Table B-2: List of Permits and Approvals

Permit/Approval	Date Issued/Comment
Existing Permits and Approvals	
Notification of Hazardous Waste Activity and Used Oil Marketer Activities (Specification and Off-Specification Used Oil Fuels)	June 30, 1994; no expiration
US EPA Acknowledgement of Hazardous Waste Activity EPA ID No. VAD988175055	November 1, 1994; no expiration
Part A Hazardous Waste Permit Application submitted for interim status activities	June 30, 1994; no expiration
Industrial Wastewater Discharge Permit #17	Issued January 1, 1996; expires December 31, 2000

Table B-3

List of Corporate Officers
Clean Harbors Environmental Services, Inc.

Director:	Alan S. McKim 74 School Street Hingham, MA 02043
President:	Alan S. McKim 74 School Street Hingham, MA 02043
Vice President/ Administration and Treasurer:	Donald N. Leef 12 Matross Lane Sharon, MA 02067
Clerk:	C. Michael Malm 84 Highland Street Newton, MA 02165

3.8 Other Hazardous Waste Activities

CHESI is a wholly-owned subsidiary of Clean Harbors, Inc., a publicly-owned Massachusetts corporation.

Clean Harbors, Inc. owns and operates eleven other waste management facilities - A discussion of these operations may be found in Clean Harbors, Inc.'s Form 10-K, included in **Appendix B-9**.

3.9 Copy of Lease

CHESI leases the premises on which the facility is located. The name and mailing address of the owner of the property on which the facility is located are:

A. A. Forbes
4003 Pfost Avenue
Prince George, VA 23875

CHESI and A. A. Forbes have entered into a lease arrangement. A copy of the lease is included in **Appendix B-10**

3.10 Hazardous Waste and Annual Amounts

A list of the hazardous wastes, and an estimate of the annual quantities to be handled at the facility, is provided in the RCRA Part A Application form which is included as Appendix A-1.

4.0 TRAFFIC INFORMATION

4.1 Primary Access Route to Facility

CHESI is a hazardous waste storage/treatment facility located at 7515 Harvest Road in Prince George, Virginia. The facility is located adjacent to a two-lane paved public road (Harvest Road) in Forbes Industrial Park, which branches off of Route 156, a paved, two-lane road, approximately two miles south of Prince George Virginia.

4.2 Onsite Vehicle Access

4.2.1 Onsite Traffic and Truck Patterns

Onsite traffic at CHESI includes personal vehicles for employees, vacuum trucks, straight vans, bulk transporters, and rack trucks arriving for hazardous waste delivery/pickup and vehicle maintenance. Onsite truck traffic patterns are shown on Drawing 1415-C-05, "Site Traffic Pattern", included as **Appendix B-11.**

4.2.2 Number/weight of Movements by Vehicle Type

CHESI estimates that the number of trucks entering the facility will average three per day during full scale operation. The types and weights of vehicles entering the facility may include:

Type	Weight-Empty (lbs)	Weight-Loaded (lbs)
Vacuum Trucks	28,000	45,000
Straight Vans	12,000	28,000
Bulk Transporters		
Tractor	30,000	30,000
Trailer	18,000	50,000
Rack Trucks	15,000	35,000

4.2.3 Traffic Control Signs/Personnel

Truck traffic at the facility is controlled by the on-duty operations manager. Upon arriving at the front gate of the facility, all vehicles shall stop and sign in at the administrative office located at the front of the facility. Upon receiving approval from the facility general Manager or his/her designee, the vehicle will proceed to the appropriate area of the facility.

All loaded vehicles are immediately directed to the concrete-lined loading/unloading pad upon arrival at the facility. The incoming vehicles remain on the concrete pad until sampling and offloading is completed.

4.2.4 Surface Composition and Load Bearing Capacity

The traffic right-of-ways at the facility upon which vehicles move consist of typical sand/loam overlain by gravel. These on-site vehicle

right-of-ways have been in use since the late 1980s, and have continually provided adequate support for fully loaded bulk transport vehicles. Based on this satisfactory record of use, CHESI believes that the load-bearing capacity for on-site traffic is sufficient. The on-site right-of-ways are recovered with fresh gravel from time to time as necessary.

4.2.5 Loading/Unloading Area

All vehicles containing hazardous waste are parked on a concrete-lined and sloped loading/offloading pad. Detailed design and secondary containment information on the loading/unloading pad is presented in Section D (Tank Management) of the RCRA Part B License Application.

Clean Harbors®
ENVIRONMENTAL SERVICES, INC.
1910 RUSSELL STREET • BALTIMORE, MD 21230
(410) 244-8200 • FAX (410) 685-3061

2403

CERTIFIED MAIL: RETURN RECEIPT REQUESTED - Z 027 798 217

May 29, 1996

Regional Administrator
Environmental Protection Agency - Region III
841 Chestnut St.
Philadelphia, PA 19107

Re: Clean Harbors of Baltimore, Inc. - Land Disposal Restriction Notification
1910 Russell St.
Baltimore, MD 21230
MDD 980555189

To Whom it May Concern:

Pursuant to 40 CFR 268.9.d., Clean Harbors of Baltimore, Inc. (CHBI) would like to notify EPA that CHBI has treated the following characteristic hazardous waste, that the treatment of these wastes has produced a residue which no longer exihibits any characteristic, and that the treatment residue will be disposed of at the Subtitle D facility noted below.

Updated in RCRIS per Peter Smith 9/20/96

(1) The notification must include the following information:

(i) The name and address of the subtitle D facility receiving the waste shipment.

Modern Landfill
R.D. #9
York, PA 17402

(ii) A description of the hazardous waste as initially generated, including the applicable EPA Hazardous Waste number(s), the applicable wastewater [as defined in 40 CFR 268.2(f)] or nonwastewater [as defined in 40 CFR 268.2(d)] category, and the subdivisions made within a waste code based on waste-specific criteria (such as D003 reactive cyanides).

Description of Waste as initially generated and EPA Hazardous Waste Number	Wastewater/ Nonwastewater	Subdivisions
Incinerator ash contaminated with chromium (D007)	Nonwastewater	none

(iii) The treatment standards applicable to the waste at the initial point of generation.

EPA Hazardous Waste Number	Treatment Standard
D007	<5.0 mg/l EP, TCLP EXTRACT

Note: Per 40 CFR 268.40, this treatment standard is based on EP Leachate but this does not preclude the use of TCLP analysis.

(2) The certification must be signed by an authorized representative and must state the language found in 40 CFR 268.7(b)(5)(i).

I certify under penalty of law that I have personally examined and am familiar with the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR part 268, subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possiblity of fine and imprisonment.

Signature

5/29/96
Date

Eric Gerstenberg
General Manager

Manifest Number

CH024431

23467

Clean Harbors®
ENVIRONMENTAL SERVICES, INC.
1200 CROWN COLONY DRIVE, P.O. BOX 9137 • QUINCY, MA 02269-9137
(617) 849-1800

Certified Mail - Return Receipt Requested P 263 091 656

September 27, 1994

Ms. Mary F. Beck, Acting Chief
U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107-4431

RE: Clean Harbors Environmental Services, Inc. - Interim Status
7515 Harvest Road Owner/Operator
Prince George, Virginia Modification
EPA ID No.: VAD988175055

Dear Ms. Beck:

Pursuant to our telephone conversation on August 5, 1994 in which you requested that Clean Harbors Environmental Services, Inc. ("CHESI") notify you of the actual date of transfer of ownership and operation of the former Chemical Waste Management facility, please be advised that this will occur on September 30, 1994. Please direct all correspondence associated with this site to:

Mr. Stephen Pozner
Senior Vice President, Compliance/Health and Safety
Clean Harbors Environmental Services, Inc.
1200 Crown Colony Drive
Post Office Box 9137
Quincy, MA 02269-9137

If you have any questions, or require additional information, please do not hesitate to contact me at (617) 849-1800, extension 4309.

Sincerely,

Stephen Pozner
Vice President, Compliance & Health and Safety

SP/njo

cc: Leslie Romanchick, VA DEQ (Certified Mail P 263091657)

Environmental
Resources
Management, Inc.

11817 Canon Boulevard
Suite 308
Newport News, VA 23606
(804) 873-4853
(804) 873-4898 (fax)

25 May 1994
Reference: P94-0832

Mr. Steve Pozner
Clean Harbors, Inc.
1200 Crown Colony Dr.
Quincy, Massachusetts 02269

ERM

Dear Mr. Pozner:

Environmental Resources Management, Inc. (ERM) is pleased to submit the following proposal to conduct an environmental site assessment for due diligence, in support of the potential acquisition of the Chemical Waste Management site in Prince George, Virginia.

SCOPE OF WORK

ERM visited the CWM site and met with John Andrews on 23 May 1994. The facility combines a RCRA-permitted treatment facility with a base for field operations crews involved in spill response, tank cleaning, and similar services. We are proposing a scope of work based upon ERM's observations during that visit and our best professional judgment of the issues. The Phase I/Phase II approach assumes concurrent activities and is designed to acquire the needed information on the site environmental status. While this approach may lead to recommendations for further investigation, it affords you considerable time savings over an approach that would rely on the completion of Phase I assessment prior to any site characterization.

ERM proposes the following tasks for the assessment:

Phase I Activities

1) A detailed site visit and characterization of the property, including an on-foot survey. The property will be investigated for signs of: open dumping, trash, areas of dead, distressed, or dying vegetation, stained soils, impoundments, seeps, oil slicks or discolorations on surface water, discernible chemical odors, storage tanks, vertical pipes, casings or other indications of

underground storage tanks, drums, transformers, and recent soil disturbances such as grading or filling. The property will also be evaluated for the presence of Federally-defined wetlands that may require protection.

2) An inspection of accessible areas of the property's improvements for possible asbestos containing materials. We understand that this leased facility was built in the 1970s and has been renovated. We have included collection and analysis of a maximum of 10 samples within this scope.

3) A review of readily available records to determine the history of the property with an emphasis on uses that have included the generation, storage, treatment or disposal of hazardous materials. Historical information includes (as available at the time of our investigation) aerial photographs, past owners recorded on property deeds for at least the last 50 years, fire insurance maps, historical archives, and interviews with the industrial park owners/management and facility personnel.

4) Investigation, to the extent possible, of neighboring activities that may have an impact on the environmental quality of the property.

5) A review of local, state, and federal records and/or telephone interviews with regulatory officials concerning environmental issues relative to the subject site.

Phase II Activities

1) Based on our initial reconnaissance of the site, ERM proposes to conduct the following activities to characterize shallow ground water:

   - Drill and Install three (3) shallow ground water monitoring wells to an approximate depth of 20 feet below ground surface. The wells will be constructed of 2" PVC with approximately 10' of well screen. Soil cuttings will be field screened using a photoionization detector for indications of residual petroleum contamination and will be temporarily placed on, and secured with, polyethylene plastic sheeting should further characterization be required.

- Develop, purge and sample the three (3) new monitoring wells in conjunction with the purging and sampling of the existing monitoring and domestic wells on-site. Development and purge water from the ground water wells will be placed into the on-site oil/water separator. Ground water from each of the five sample locations will be analyzed for Total Petroleum Hydrocarbons (TPH) by Method 8015A (GC/FID) for both gasoline and diesel fuel fractions. Additionally, each of the five wells will be analyzed for benzene, toluene, ethylbenze and xylenes (BTEX) by Method 8020. This activity will allow for adequate coverage and a cost effective evaluation of shallow aquifer conditions beneath the site.

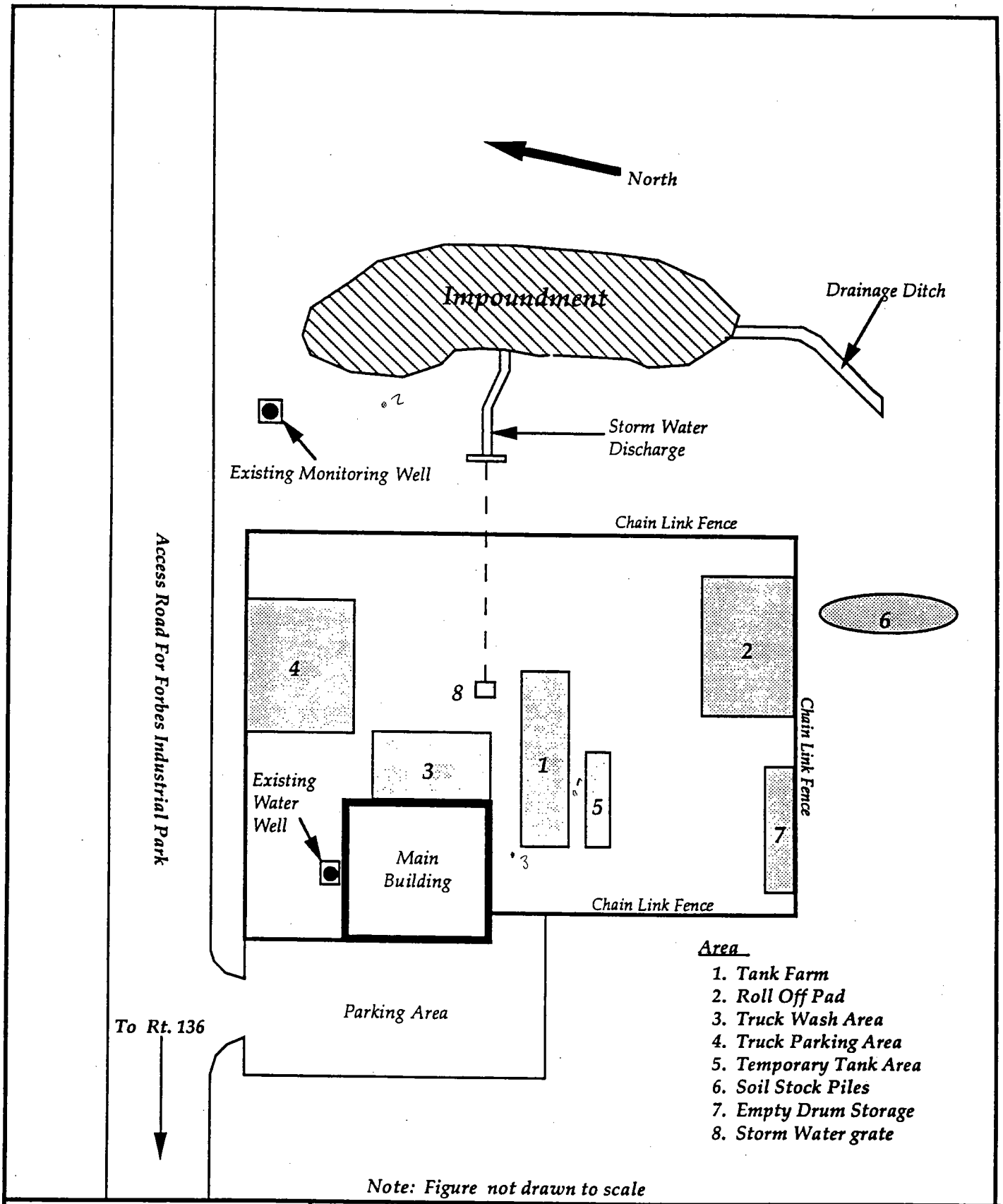
2) ERM proposes to conduct the following activities to evaluate potential contamination from past practices at the site:

- Eight areas of potential petroleum impact to surficial soils or site fill materials from routine site activities have been tentatively identified (see Figure 1). They are:

  1) Tank Farm
  2) Roll Off Pad
  3) Truck Wash Area
  4) Truck Parking Area
  5) Temporary Tank Area
  6) Soil Stockpiles
  7) Empty drum Storage Area
  8) Storm Water Grate Area

  ERM personnel will identify and document each of these locations and will collect representative aliquots of surficial soil materials to create one (1) composite soil sample from each of the eight (8) areas. Composite soil samples collected will be analyzed for TPH by Method 8015A for both gasoline and diesel fuel fractions as well as BTEX by Method 8020.

- In order to characterize Storm Water run-off from the site, ERM personnel will collect surface water samples from ; A) the outfall of the storm grate discharge to the surface water impoundment and; B) the overflow drainage ditch for the



Note: Figure not drawn to scale

W.O. # :	
Drawn By /Date:	ATF / 5-23-94
Checked By /Date:	RDM / 5-24-94
Revised By /Date:	
Checked By /Date:	

Figure 1

Chemical Waste Management, Inc.

Forbes Industrial Park
Hopewell, Virginia

ERM
808 Moorefield Park Drive, Suite 200
Richmond, Virginia 23236
(804) 330-8990

surface water impoundment . It is anticipated that two (2) surface water samples will be collected and analyzed for TPH (both gasoline and diesel fractions) by Method 8015A and BTEX by Method 8020.

Although we believe this Phase II scope to be adequate based on our initial site reconnaissance, further sample collection and analyses may be recommended based on the results of the Phase I and Phase II investigations.

ERM

Per our discussions, ERM will ship these samples to Clean Harbors' analytical laboratory for analysis.

A report describing the results of all tasks will be prepared, and will include all necessary documentation and appendices.

The client will arrange for ERM to have access to the property.

FINDINGS

ERM will verbally inform you of the results of tasks as they become available. If previously undiscovered potential for environmental contamination is found, a decision will be required on whether to conduct additional studies.

CONFIDENTIALITY OF DATA

All data will be maintained as confidential, and the report will be prepared for the exclusive use of Clean Harbors unless a written agreement states otherwise.

SCHEDULE

ERM would propose to initiate the site work within one week of receiving written authorization to proceed. All field work would be completed within two weeks, with samples submitted to your laboratory for analysis. Assuming that Clean Harbors can provide a standard lab turnaround time of two weeks or less, a report will be submitted to you within five weeks of your notice to proceed.

PROJECT ORGANIZATION

Neil Peters will be the Project Director and principal in charge, responsible for overall quality and consistency with ERM standards and assuring the availability of necessary resources. Gina Dixon will be the project manager, responsible for coordinating the efforts of all ERM staff and subcontractors, performing day to day management functions, overseeing the budget, and assuring that all deadlines are met. ERM anticipates the use of subcontractors for drilling and asbestos analysis.

BUDGET

It is proposed that the services in the project scope outlined above be performed on the basis of ERM's standard hourly charges for project personnel plus direct expenses. It is expected that the project scope outlined above can be accomplished for an Estimated Probable Cost of $9,850.

Only those costs incurred by ERM will be charged, but they will not exceed the Estimated Probable Cost without your prior approval. To avoid misunderstanding, it should be emphasized that the Estimated Probable Cost is a budget estimate, based on present knowledge of the project, which is believed sufficient to cover services herein described, but no guarantee is made or implied with respect to the actual cost of performing the project.

Invoices will be submitted monthly based on effort to date with payment expected within 30 days. The performance of services by ERM shall be governed by ERM's General Terms and Conditions, dated September 1989, and amended as shown in the copy which is attached to this proposal and incorporated as part of this proposal.

LIMITATIONS

As applicable and available within the project schedule and budget, we will review historical aerial photographs, environmental agency records, well logs, and other public geologic records regarding the site. We cannot guarantee that these reviews will necessarily yield complete or usable information. Lack of knowledge of prior uses may affect our ability to completely assess risks or hazards at the site. Further, there can be no assurance that any sampling techniques employed will necessarily disclose all contaminants at the site due, among other things and without limitation, to such factors as a practical and economic

limitation on the number and location of samples, sample depth, lack of current definition of a particular material as hazardous, and the like. Further, we assume no liability for existing conditions on the site.

To the extent that the services require judgment, there can be no assurance that fully definitive or desired results will be obtained, or if any results are obtained, that they will be supportive of any given course of action. The services may include the application of judgment to scientific principles; to that extent certain results of this work may be based on subjective interpretation.

ERM

ERM is not engaged in environmental auditing and reporting for the purpose of advertising, sales promotion, or endorsement of any client's interests, including raising investment capital or recommending investment decisions, or other publicity purposes. The client acknowledges that any reports prepared by ERM are for the exclusive use of the client and agrees that ERM's reports or correspondences will not be used or reproduced in full or in part for such promotional purposes, and may not be used or relied upon in any prospectus or offering circular. The client also agrees that none of its advertising, sales promotion, or other publicity matter containing information obtained from this audit and report will make reference to ERM's trade name.

Nothing contained in the report of ERM shall be construed as a warranty or affirmation by ERM that the site and property described in the report are suitable collateral for any loan or that acquisition of such property by any lender through foreclosure proceedings or otherwise will pose no risk of potential environmental liability on the part of such lender.

The information to be provided under this proposal is not to be construed as legal advice.

If this proposal is acceptable to you, please indicate your agreement by signing the enclosed copy of the proposal in the space provided below, and by returning to me the executed copy of this proposal. Upon receipt of the acceptance copy, we will commence the performance of services described in this proposal. For your convenience, and to expedite the start of your project, you may wish to FAX your acceptance to us at (804) 873-4898.

If you have any questions or comments, or require additional information, please feel free to call me at (804) 873-4853.

Sincerely,

Gina Dixon
Branch Manager

ERM

Agreed and Accepted:

By:_____ _____
(Signature) (Printed Name)

_____ _____
(Title) (Date)

Chemical Waste Management, Inc.
Technical Services Division
P. O. Box 757
Hopewell, Virginia 23860
804/452-1750 FAX: 804/458-6192

September 13th, 1993

Mr. Russ McAvoy
Virginia Department of Environmental Quality
Hazardous Waste Facility Permitting
Monroe Building
101 North 14th Street
Richmond, VA 23219
(hand delivered)

Mr. Robert L. Allen, Chief
RCRA Programs Branch
United States Environmental Protection Agency
Region III
841 Chestnut Street
Philadelphia, PA 19107
(certified mail)

RE: CWM Hopewell Facility (VAD988175055)

Gentlemen,

Enclosed please find an updated form 8700-23 Part A application and an updated form 8700-12 Notification of Hazardous Waste Activity for our Hopewell, Virginia facility. The updating of these forms reflects several changes in the personnel operating the facility and organizational changes within Chemical Waste Management. The facility is upgrading it's tank storage area by replacing the 10,000 gallon and 5,000 gallon tanks with one, new 15,000 gallon tank. Auxiliary equipment such as the oil/water separator and the carbon adsorption units have been replaced with newer units. Please note that the tank storage capacity has not increased and remains 15,000 gallons.

As you know our facility accepts mixtures of water and petroleum products (gasoline, diesel etc.) for separation and adsorption. Once separated, these wastes are sent off-site for energy recovery or disposal. Should you have any questions regarding our facility or this submission, please contact me at 609-243-7947.

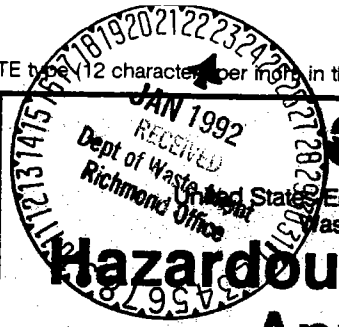
Sincerely,

Dave Swiney

Dave Swiney
Chemical Waste Management, Inc.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 12-31-9
GSA No. 0246-EPA-O



For EPA Regional Use Only		For State Use Only
Date Received Month Day Year		

EPA

United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application Part A

(Read the Instructions before starting)

I. ID Number(s)

A. EPA ID Number: VAD981755055

B. Secondary ID Number *(if applicable)*:

II. Name of Facility

CWM HOPEWELL FACILITY

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street: 7500 HARVEST ROAD

Street *(continued)*:

City or Town: PRINCE GEORGE

State: VA

ZIP Code: 23875-

County Code *(If known)*:

County Name: PRINCE GEORGE

B. Land Type *(enter code)*: P

C. Geographic Location

LATITUDE *(degrees, minutes, & seconds)*: 37 15 02 3

LONGITUDE *(degrees, minutes, & seconds)*: 077 16 00 1

D. Facility Existence Date

Month Day Year: 09 01 1989

IV. Facility Mailing Address

Street or P.O. Box: PO BOX 757

City or Town: HOPEWELL

State: VA

ZIP Code: 23860-

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(last)*: SCHLEINKOFER

(first): MICHAEL

Job Title: OPERATIONS MGR

Phone Number *(area code and number)*: 804-452-1750

VI. Facility Contact Address *(See Instructions)*

A. Contact Address Location: - Mailing: X

B. Street or P.O. Box:

City or Town:

State:

ZIP Code:

EPA I.D. Number (enter from page 1)

V	A	D	9	8	8	1	7	5	0	5	5

Secondary ID Number (enter from page 1)

XI. Nature of Business (provide a brief description)

Chemical Waste Management Technical Services Division provides many different services to the producers of hazardous waste. Lab packaging, underground storage tank removal and installation, processing, storage and transportation of waste are among the services offered. The Hopewell facility accepts and processes waste oil which is then shipped offsite for disposal.

XII. Process – Codes and Design Capacities

A. PROCESS CODE - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in Item XIII.*

B. PROCESS DESIGN CAPACITY - *For each code entered in column A, enter the capacity of the process.*

1. **AMOUNT** - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.*
2. **UNIT OF MEASURE** - *For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.*

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units used with the corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	DISPOSAL:	
D79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY
D80	LANDFILL	ACRE-FEET OR HECTARE-METER
D81	LAND APPLICATION	ACRES OR HECTARES
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	STORAGE:	
S01	CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS
S02	TANK	GALLONS OR LITERS
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	TREATMENT:	
T01	TANK	GALLONS PER DAY OR LITERS PER DAY
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR
T04	OTHER TREATMENT (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in Item XIII.)	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
GALLONS PER HOUR	E
GALLONS PER DAY	U
LITERS	L
LITERS PER HOUR	H
LITERS PER DAY	V
SHORT TONS PER HOUR	D
METRIC TONS PER HOUR	W
SHORT TONS PER DAY	N
METRIC TONS PER DAY	S
POUNDS PER HOUR	J
KILOGRAMS PER HOUR	R
CUBIC YARDS	Y
CUBIC METERS	C
ACRES	B
ACRE-FEET	A
HECTARES	Q
HECTARE-METER	F
BTU's PER HOUR	K

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)											
V	A	D	9	8	8	1	7	5	0	5	5												

XIV. Description of Hazardous Wastes

A. EPA HAZARDOUS WASTE NUMBER - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY - *For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE - *For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. **PROCESS CODES:**

   For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

   For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that characteristic or toxic contaminant.

   NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

   1. *Enter the first two as described above.*
   2. *Enter "000" in the extreme right box of Item XIV-D(1).*
   3. *Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).*

2. **PROCESS DESCRIPTION:** *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

   NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER- Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

   1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
   2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.*
   3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS (1) PROCESS CODES (enter)									D. PROCESS (2) PROCESS DESCRIPTION (if a code is not entered in D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

NATIONAL GUARANTY INSURANCE COMPANY

7 BURLINGTON SQUARE, 6th FLOOR • BURLINGTON, VT 05401 • 1-800-876-6442

CERTIFICATE OF INSURANCE

CLOSURE

Name and Address of Insurer (hereinafter called the "Insurer"):

NATIONAL GUARANTY INSURANCE COMPANY

7 Burlington Square, 6th Floor, P.O. Box 530, Burlington, Vermont 05402-0530

Name and Address of Insured (hereinafter called the "Insured"):

CHEMICAL WASTE MANAGEMENT, INC.

7500 Harvest Road, Prince George, Virginia 23875

Facilities Covered:

EPA ID Number: VAD988175055

Name: CWM HOPEWELL FACILITY

Address: 7500 Harvest Road

Prince George, VA 23875

Coverage: Closure: A. $79,430.00

Post-Closure: B. Nil

Policy Face Amount: $79,430.00

Policy Number: CPCH92-0001

Effective Date: January 13, 1992

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure and post-closure care for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of Sections 9.7.C.4. and 9.7.E.4. as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Executive Director of the Virginia Department of Waste Management, the Insurer agrees to furnish to the Executive Director a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in Section 9.7.K.4. of the Virginia Hazardous Waste Regulations as such regulations were constituted on the date shown immediately below.

Leo J. Winstead
Authorized signature for Insurer

January 16, 1992
Date

Leo J. Winstead
Name of person signing

Attorney-in-fact
Title of person signing

"OFFICIAL SEAL"
ROBERTA A. KRENEK
NOTARY PUBLIC, STATE OF ILLINOIS
My Commission Expires 8/10/94

Sworn to before me this 16th day of January, 1992

Roberta A. Krenek
Notary Public

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 12-31-91
GSA No. 0246-EPA-OT

EPA I.D. Number *(enter from page 1)*: V A D 9 8 8 1 7 5 0 5 5

Secondary ID Number *(enter from page 1)*:

XIV. Description of Hazardous Waste *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

Line Number	Additional Process Codes (enter)

XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

X Owner Signature: [signature] Date Signed: 1/20/92

Name and Official Title *(type or print)*: John Cirello - CWM Eastern Region Vice President

Operator Signature: Date Signed:

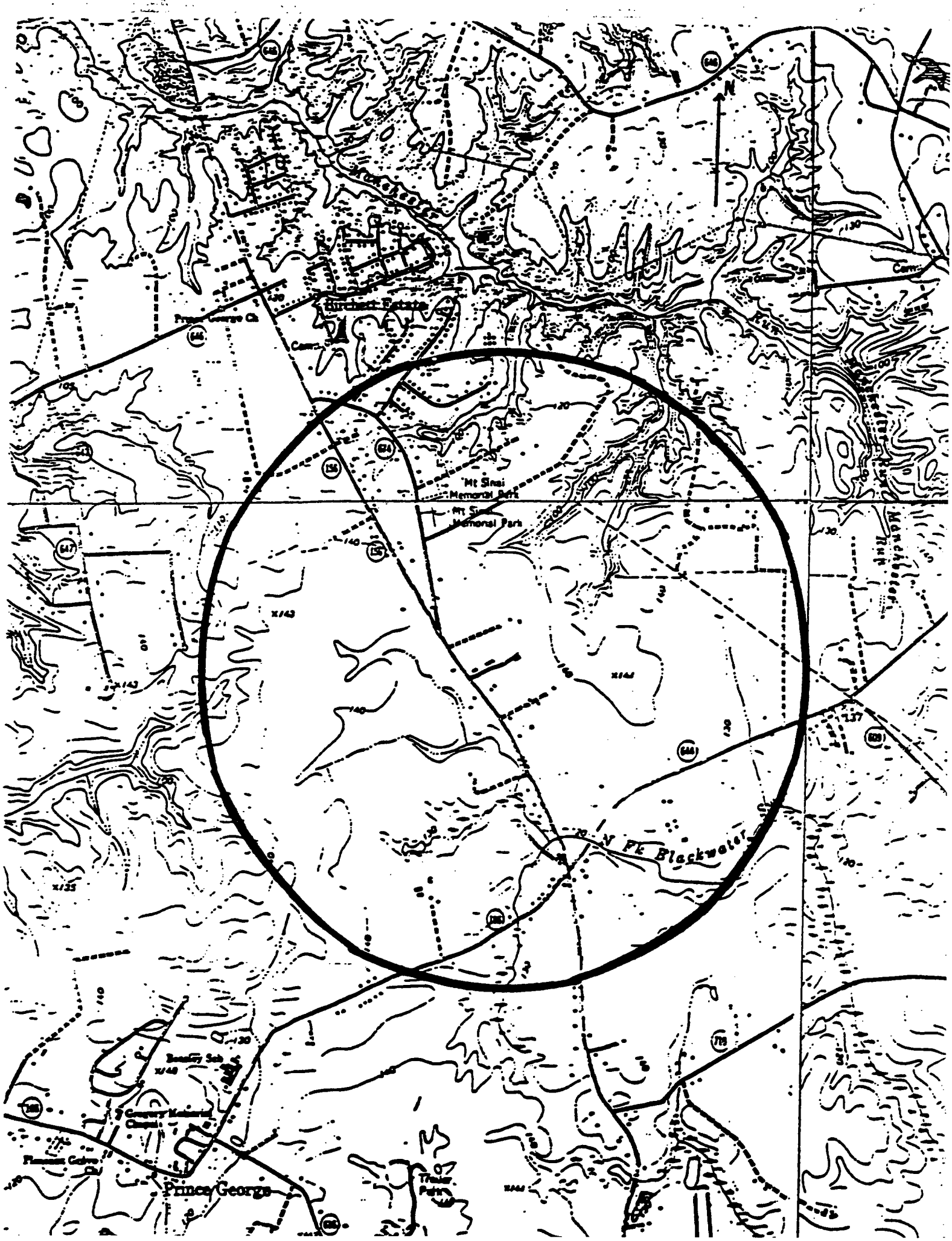
Name and Official Title *(type or print)*:

XIX. Comments

PROPERTY OWNER: Mr. A.A. Forbes
4003 Pfost Ave
Prince George, VA 23875
804-458-8870

N.B.- Original photos were sent to US EPA Region III in Sept. of 1990

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)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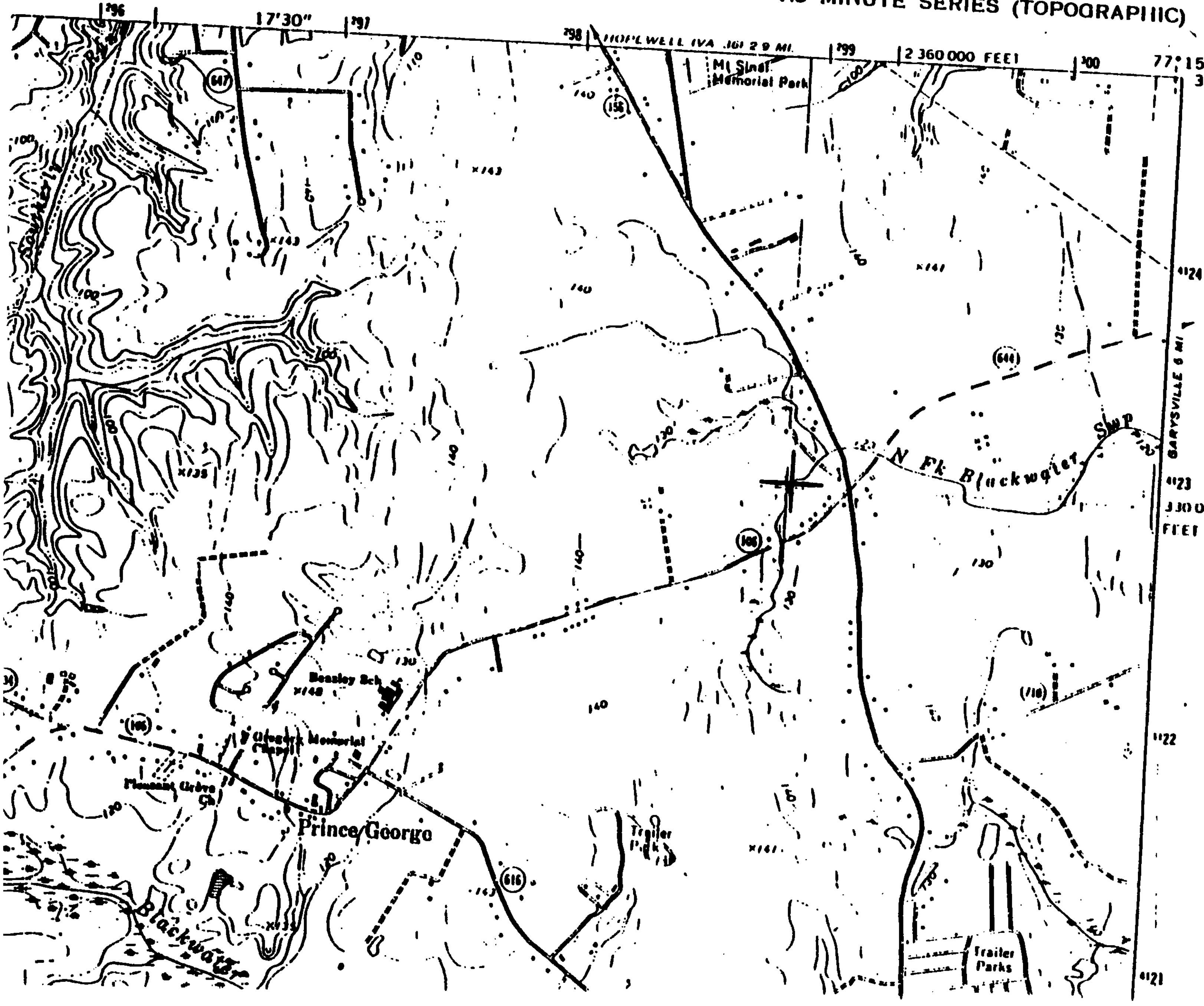
Birchett Estate
Mt Sinai
Memorial Park
Mt Sinai
Memorial Park
N Pk Blackwater
Prince George

PRINCE GEORGE QUADRANGLE
VIRGINIA
7.5 MINUTE SERIES (TOPOGRAPHIC)

5558 I SW
(WESTOVER)



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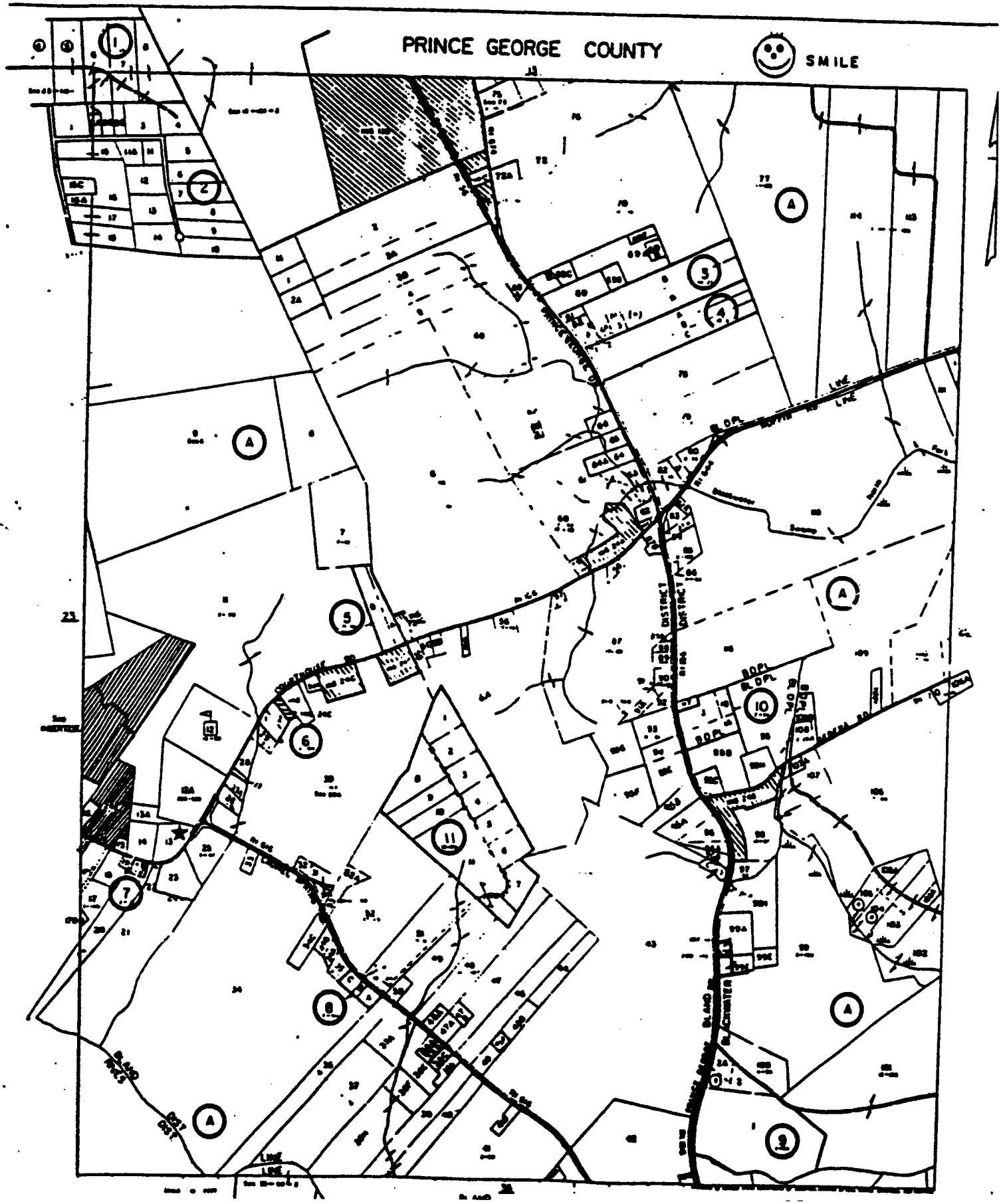
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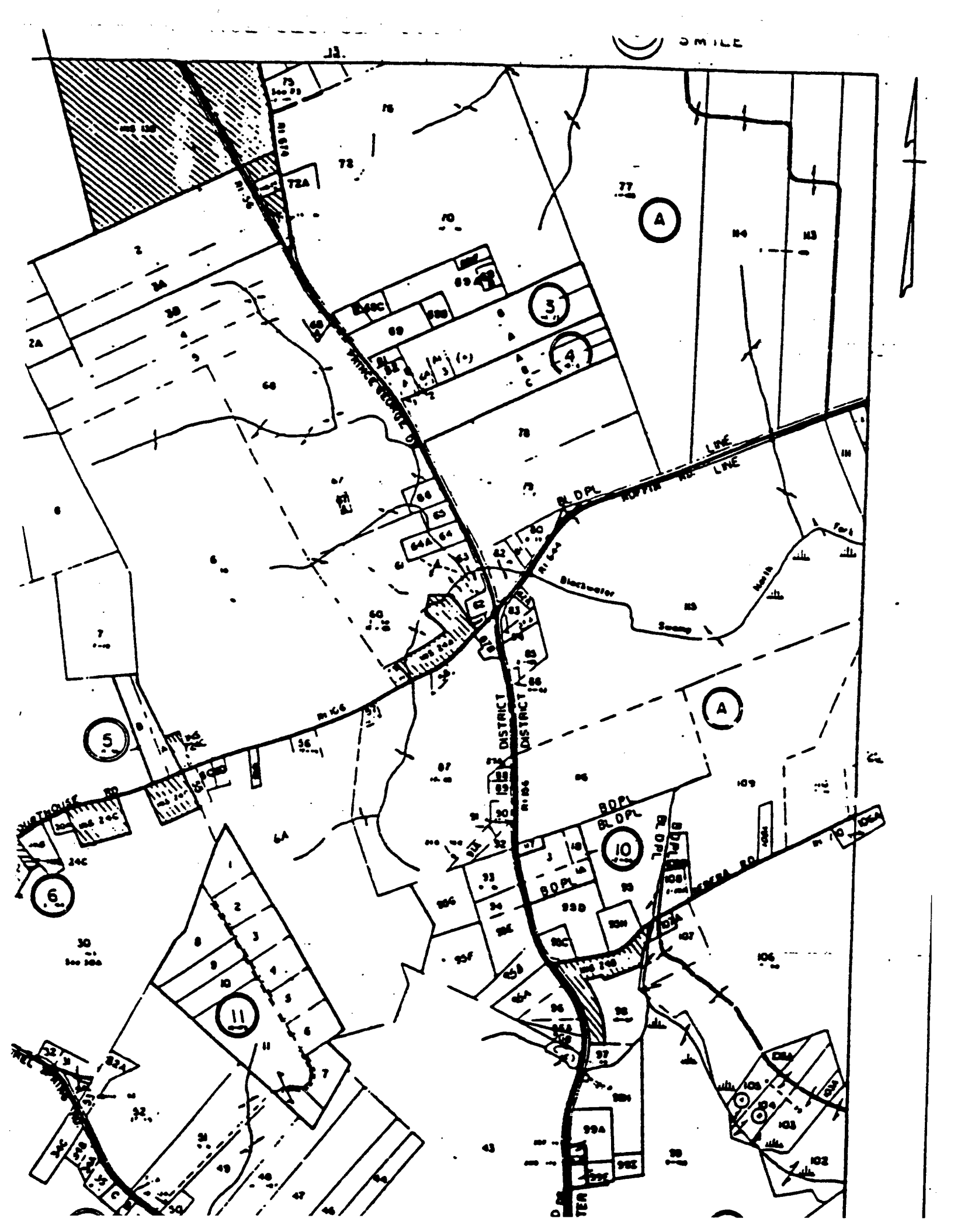
SMILE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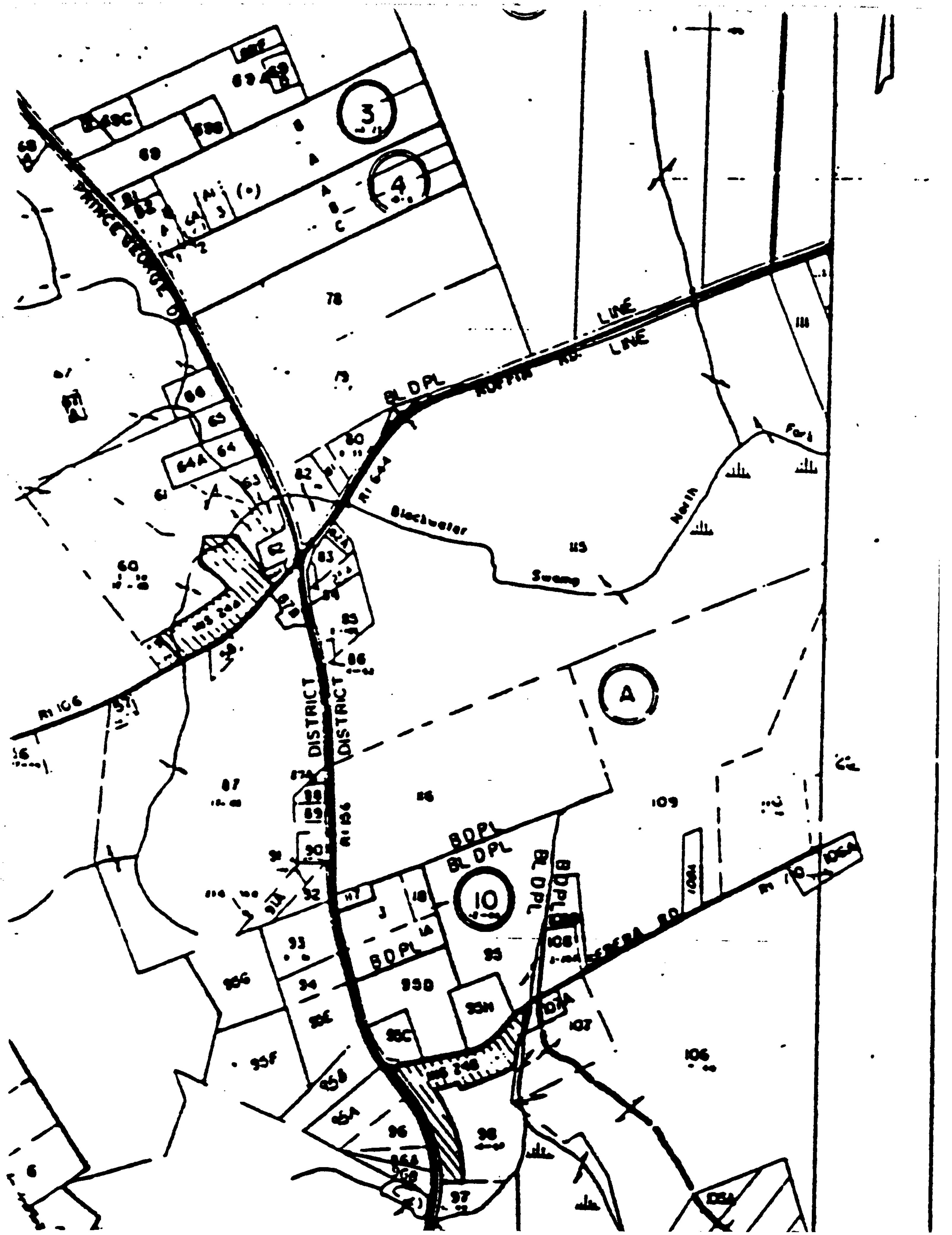
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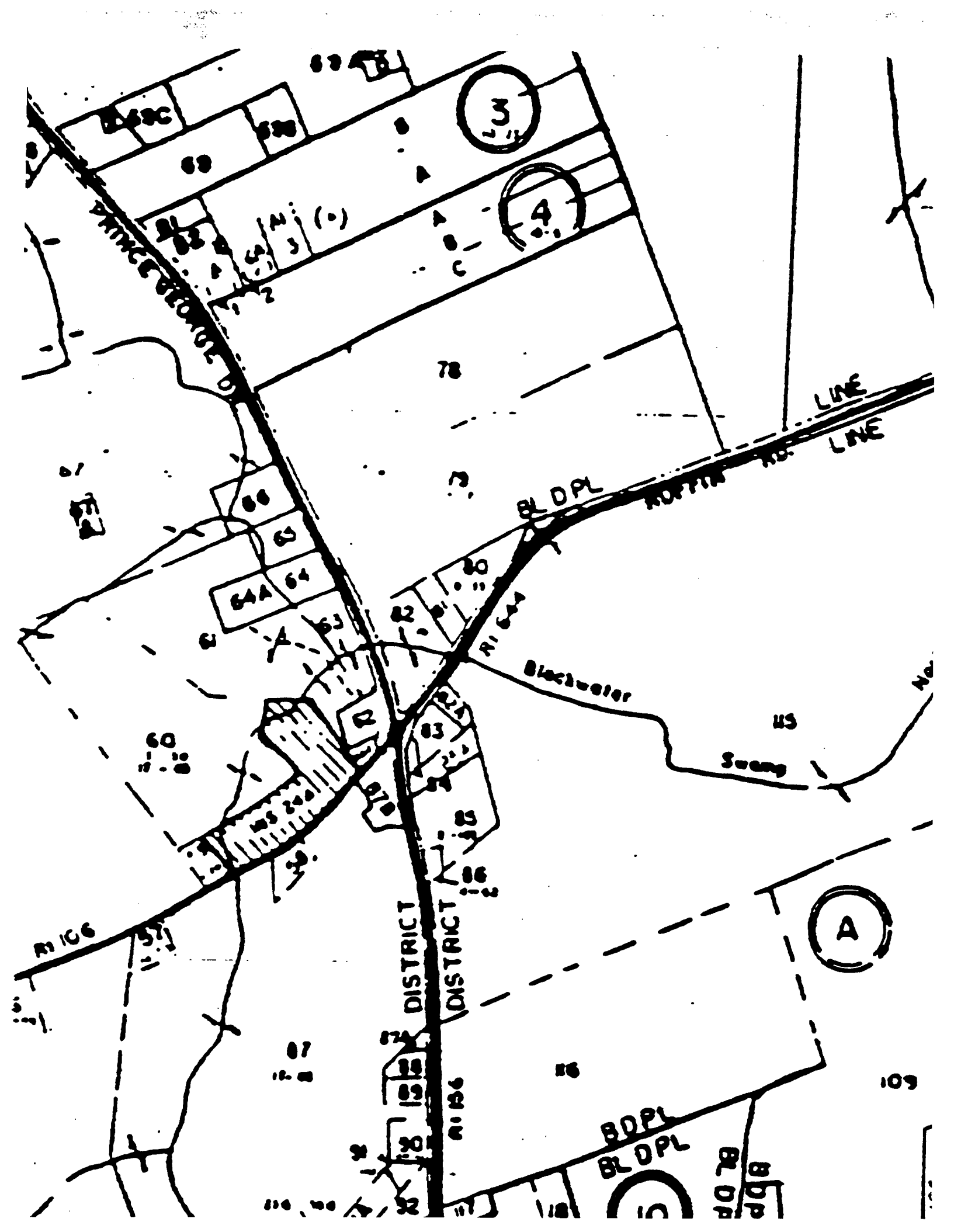
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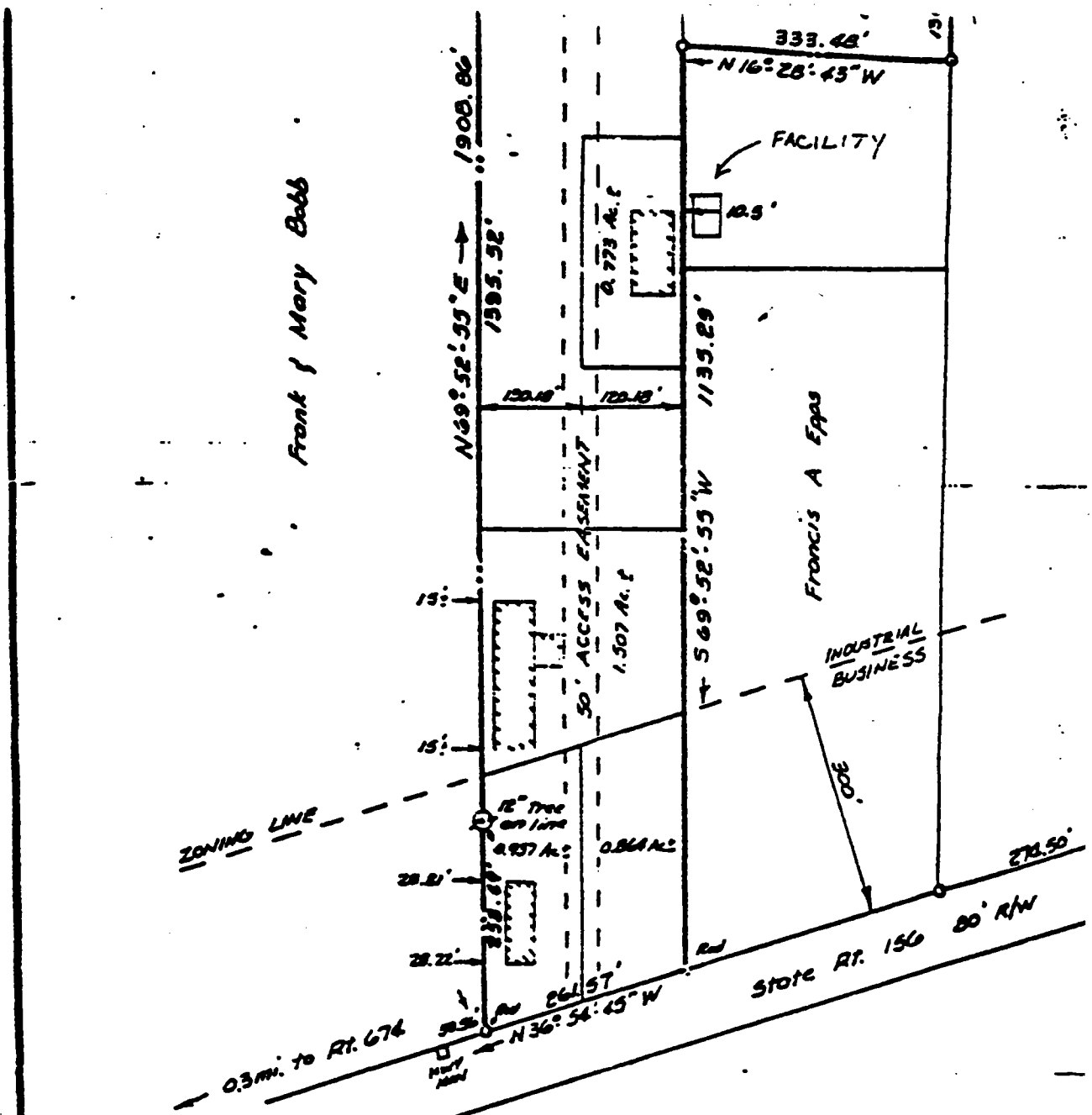
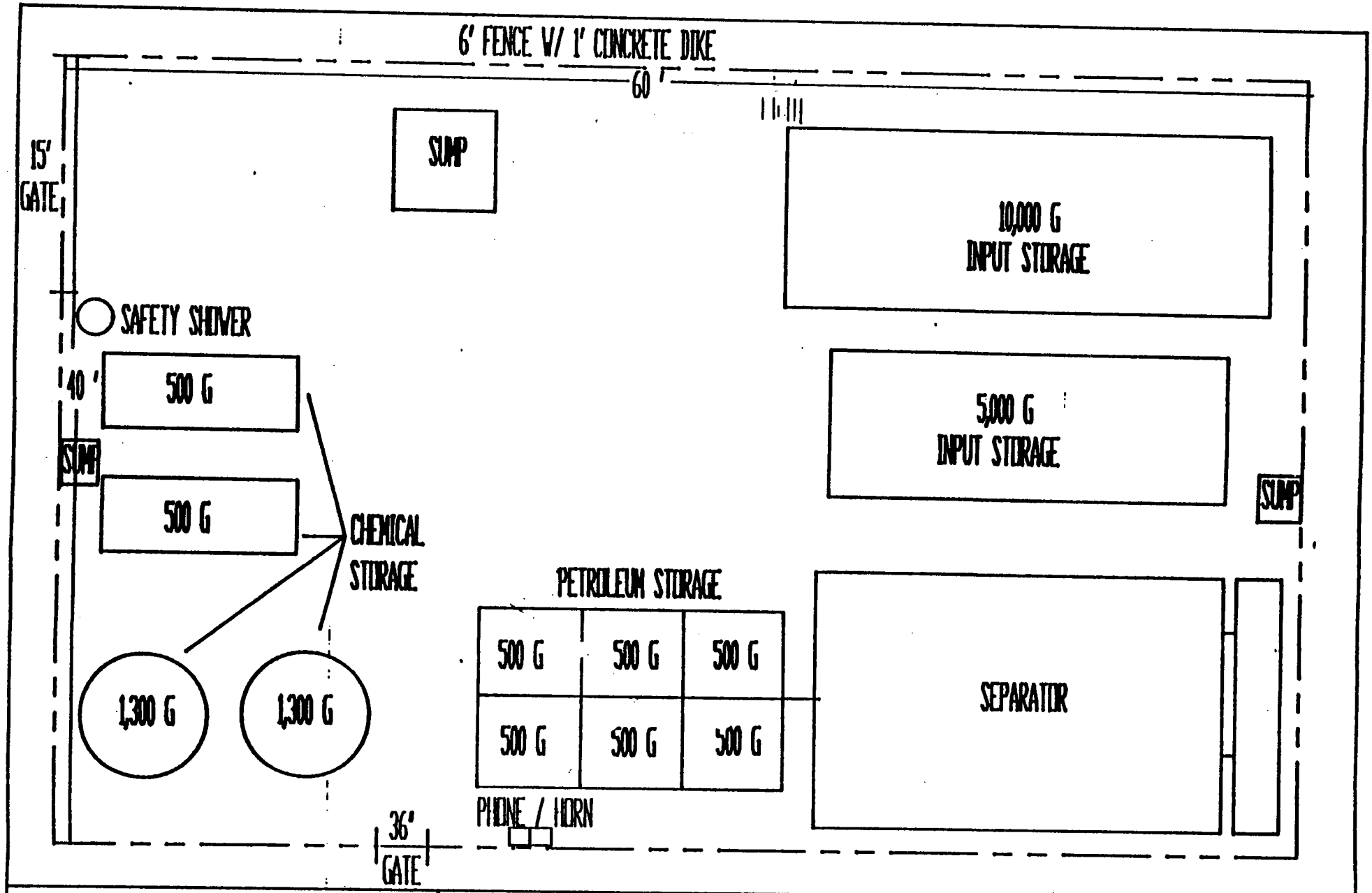


COMMONWEALTH OF VIRGINIA
WALTER M. ALTMAN III
No. 1363
LAND SURVEYOR

Plat Showing a 1.973 Ac
Divided from
FORBES INDUSTRIAL
State Route 156
Bland Dist., Prince Georg

LEGAT AND ASSOCIAT
CONSULTING ENGINEERS AND S
HOPEWELL, VIRGINIA

SCALE	DATE	PROJ
1" = 200'	July 26, 1983	8357

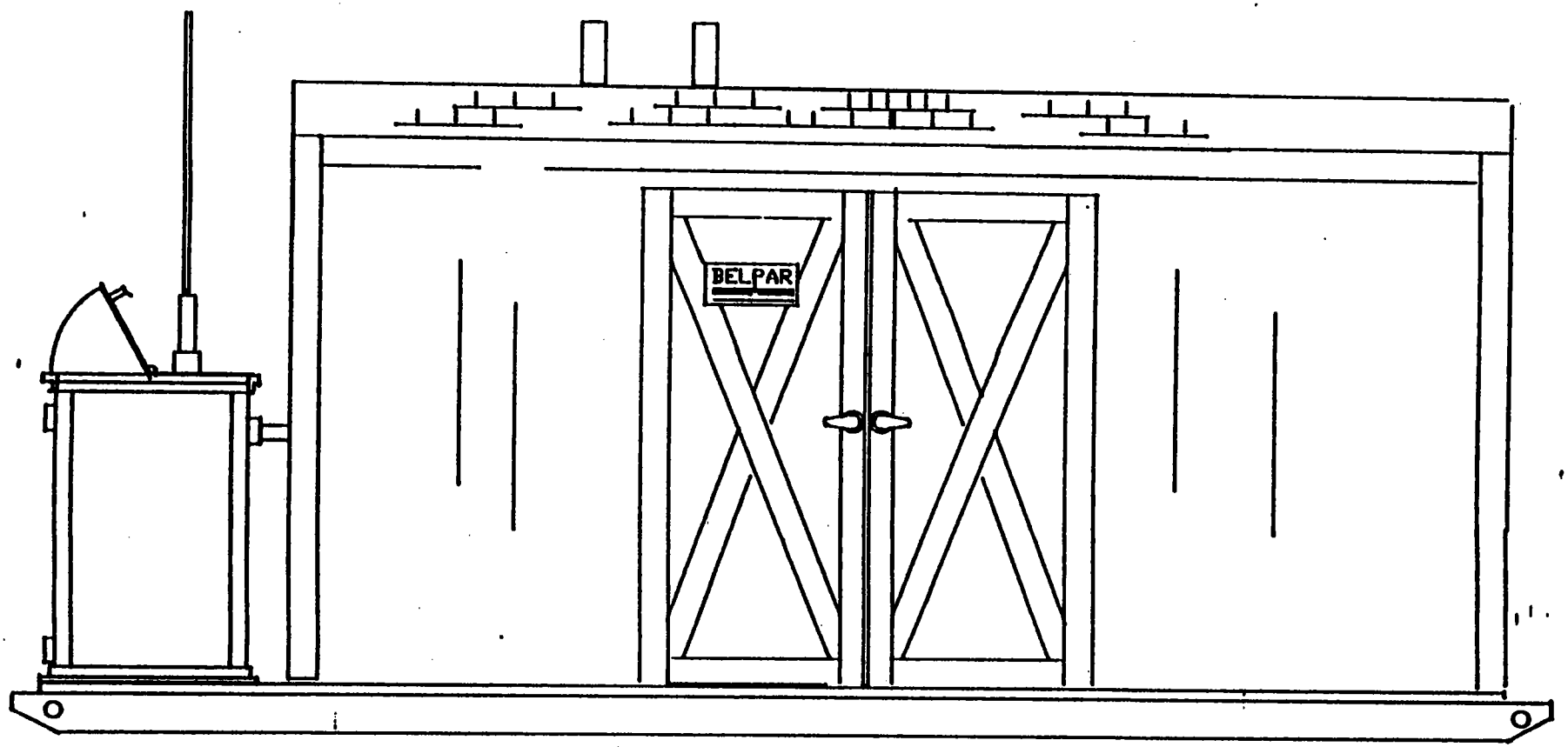


BELPAR ENVIRONMENTAL, INC.
7500 Harvest Road Prince George, VA 23875
· An Ameriquest Company

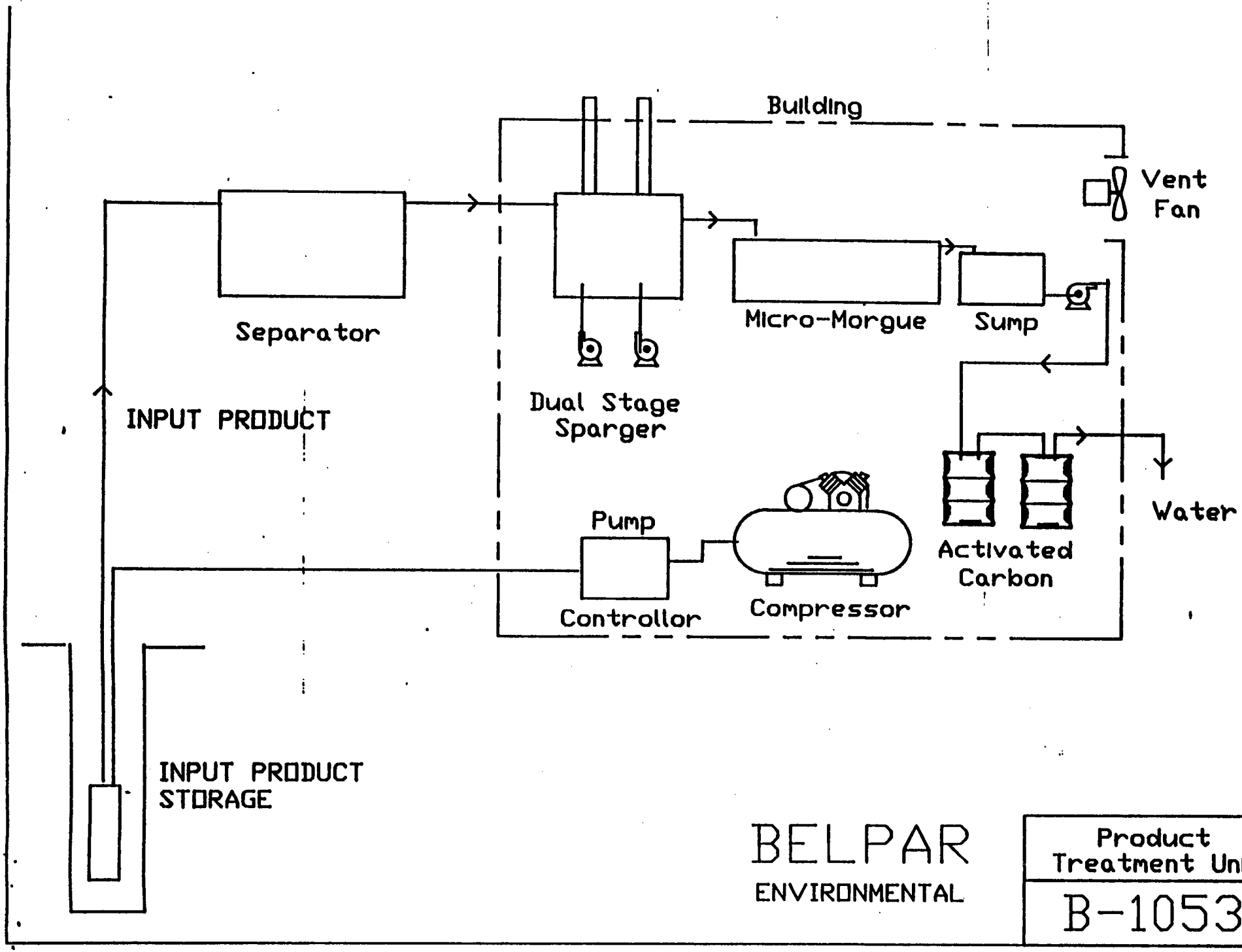
CLIENT:

SITE:

PROJECT NO.:	APPROVED BY:			3	
DRAWING NO.:	NO.	REVISION	DATE	4	
DRAWN BY:	1			5	
DATE:	2			6	



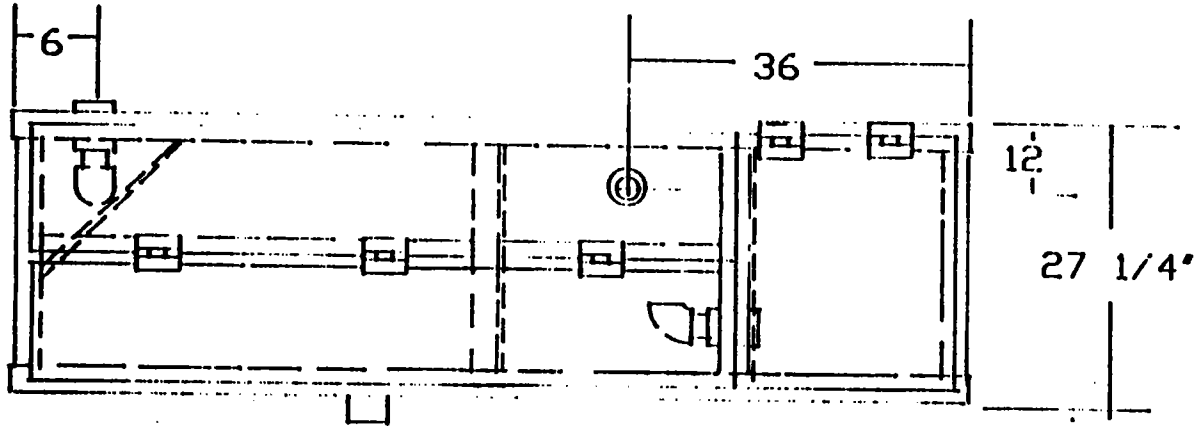
B-1053 A



BELPAR
ENVIRONMENTAL

Product Treatment Unit

B-1053



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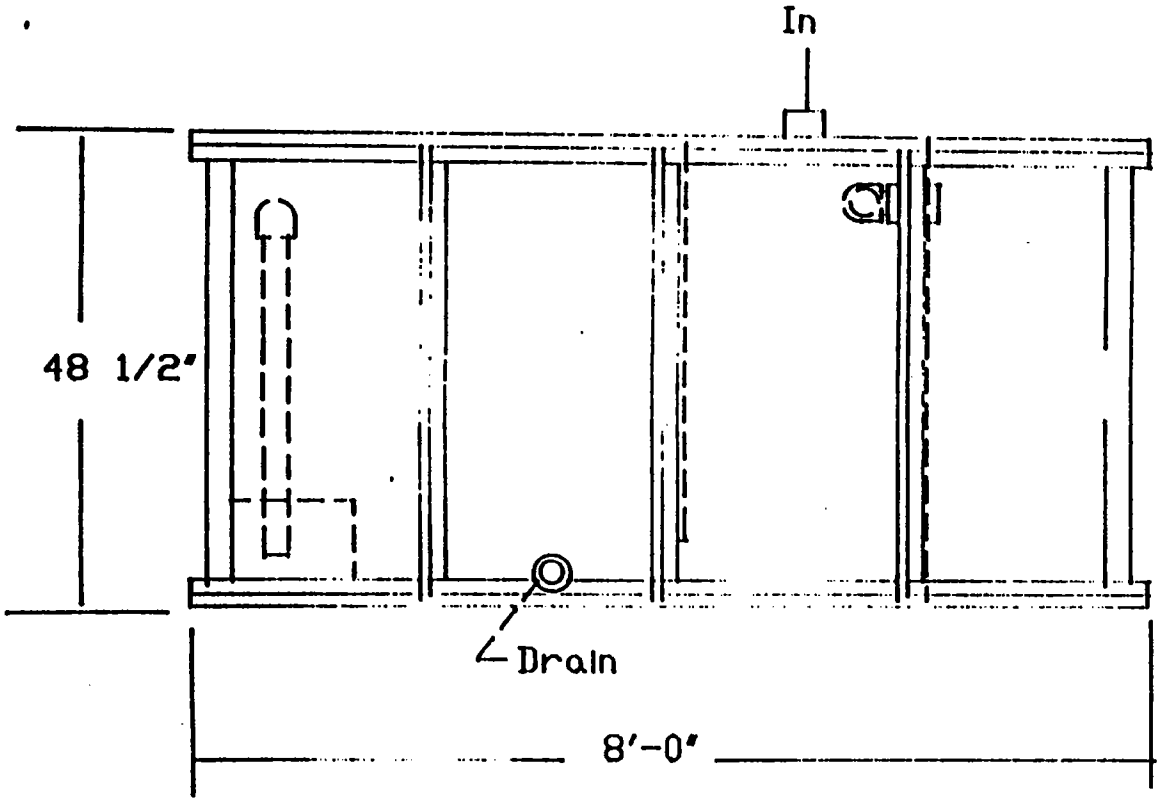
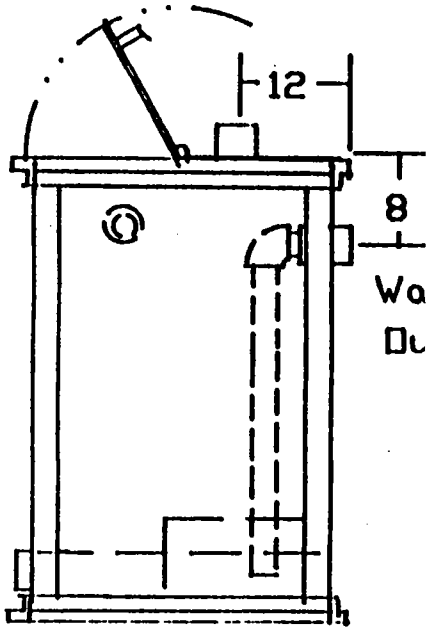
Oil/Water Separa

500 Gal Alumi



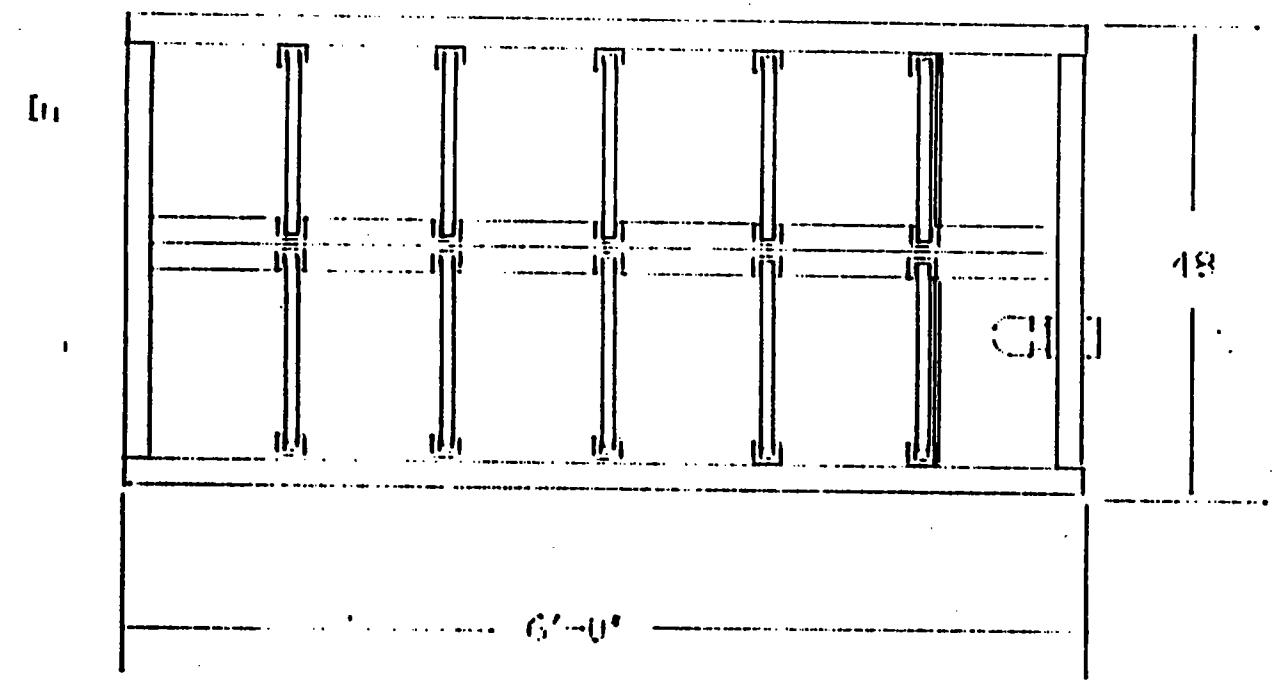


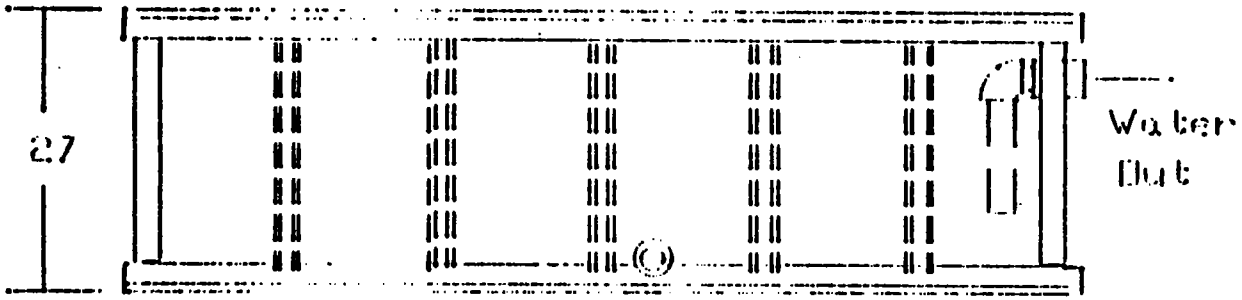
B-10

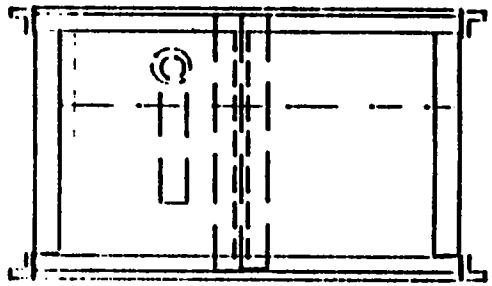
BELPAR

MICRO-MORGUE

Aluminum







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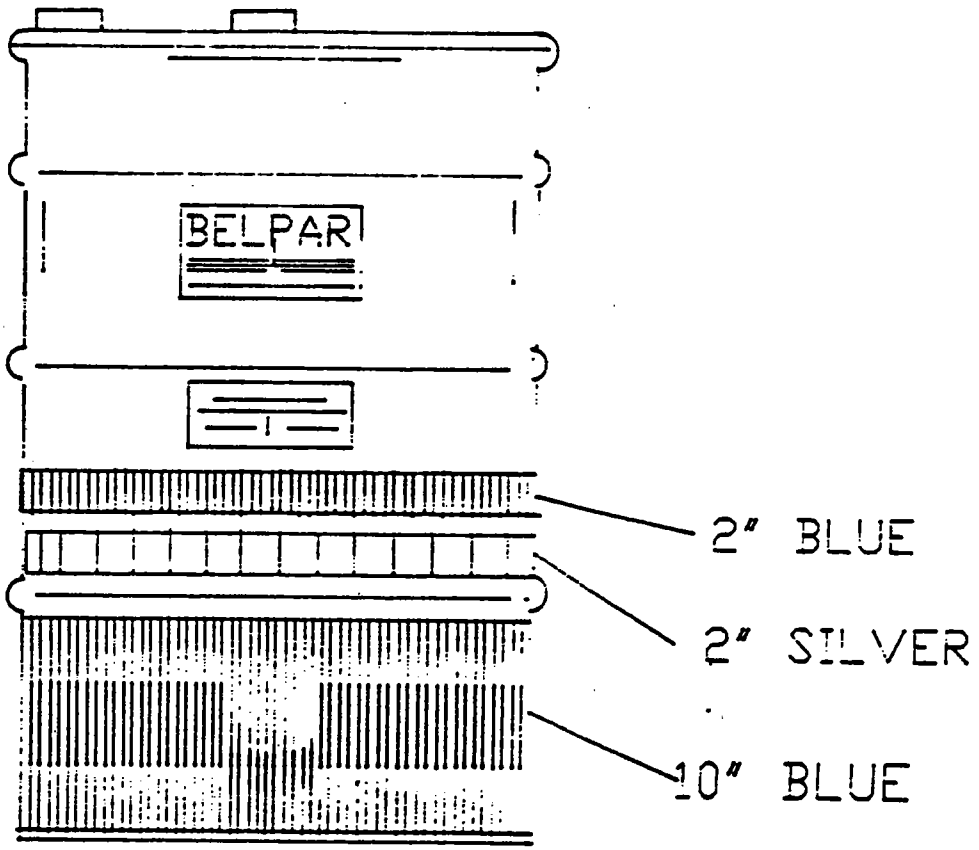

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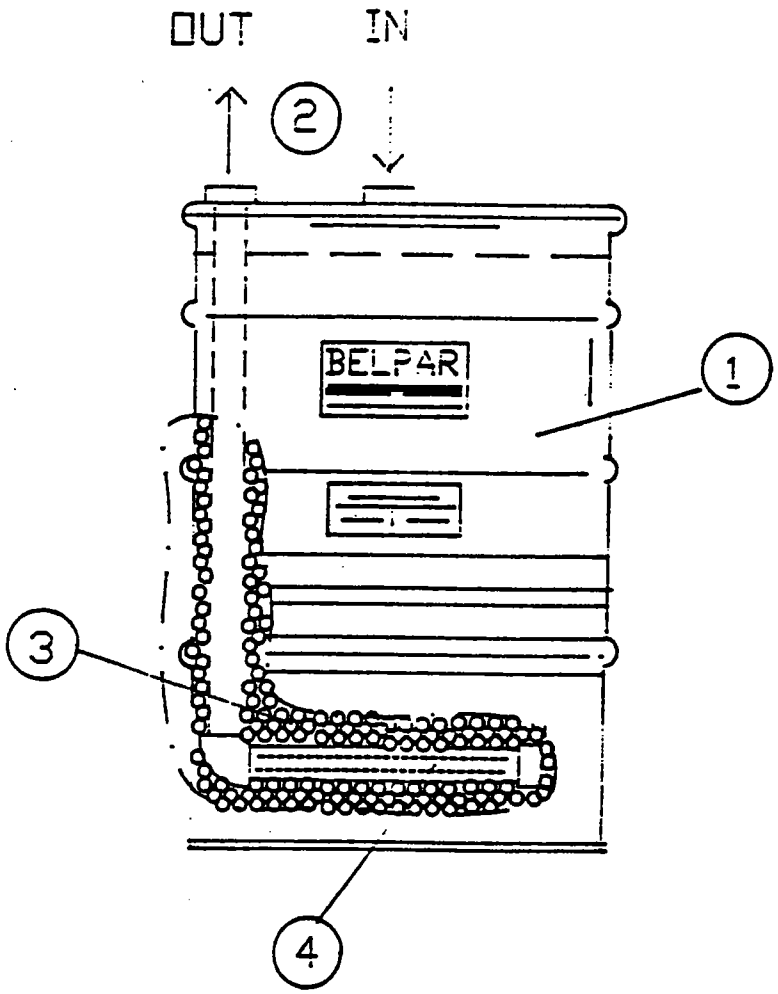
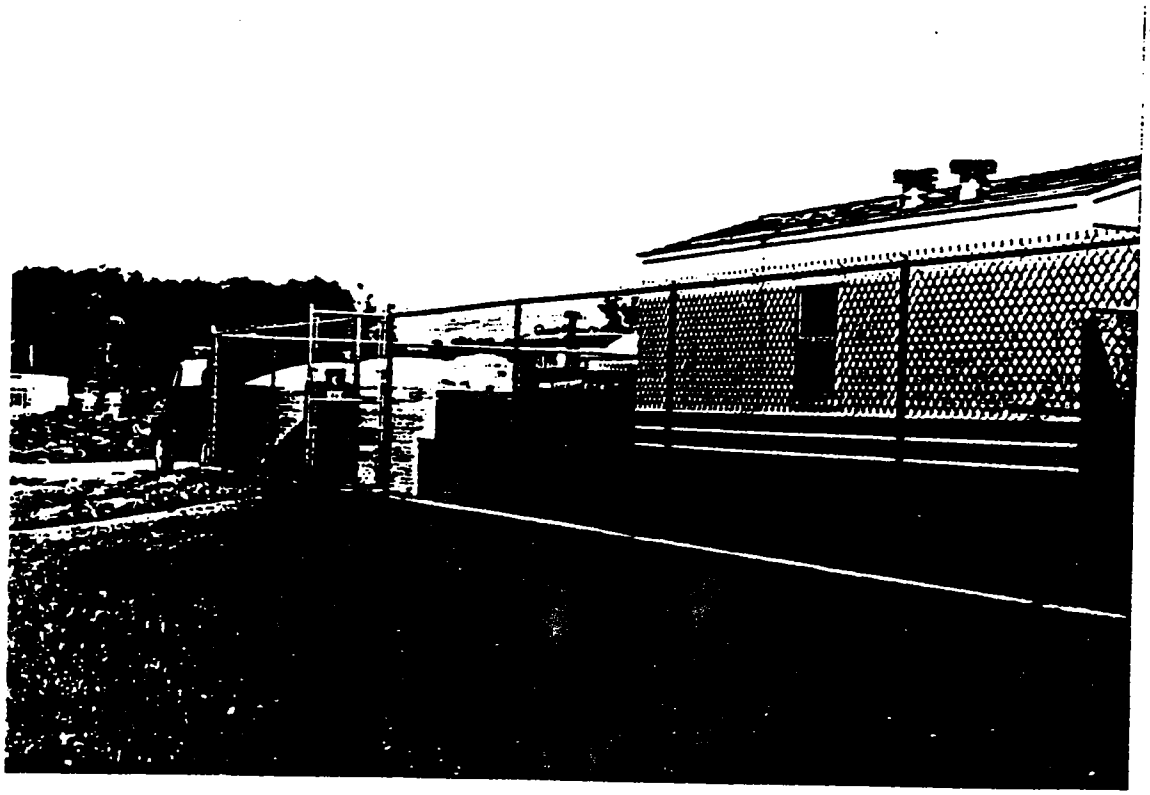
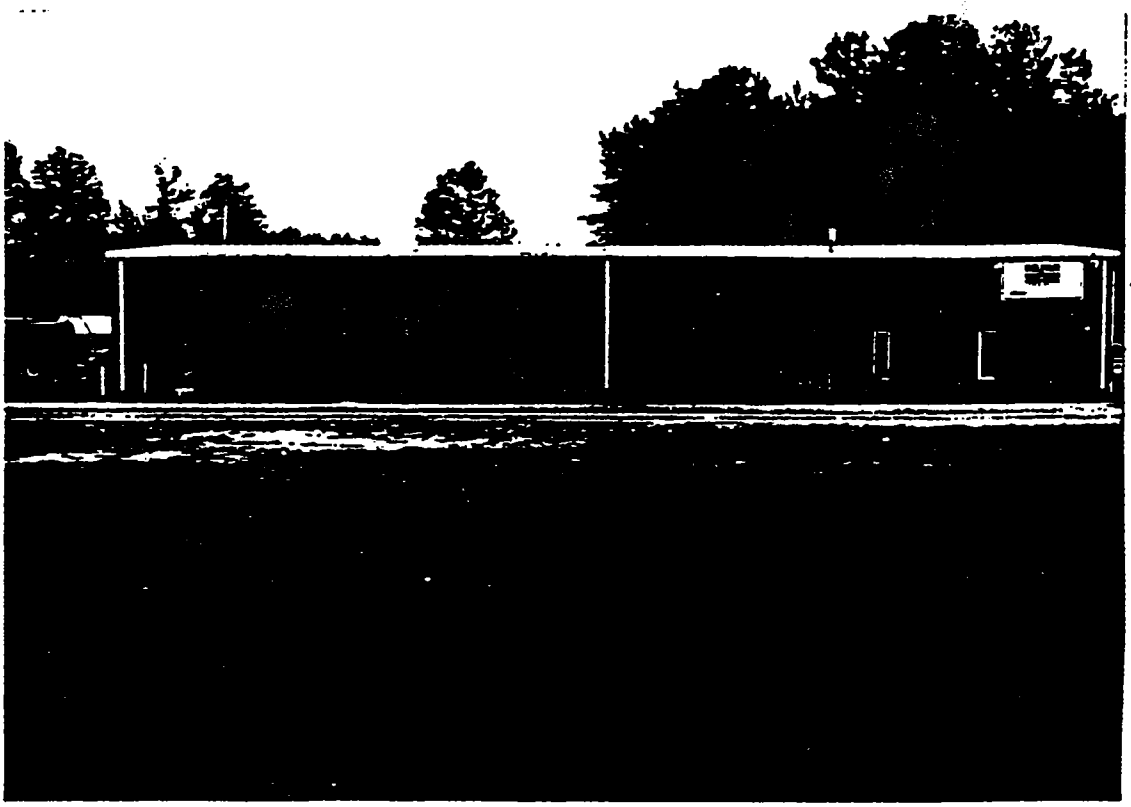
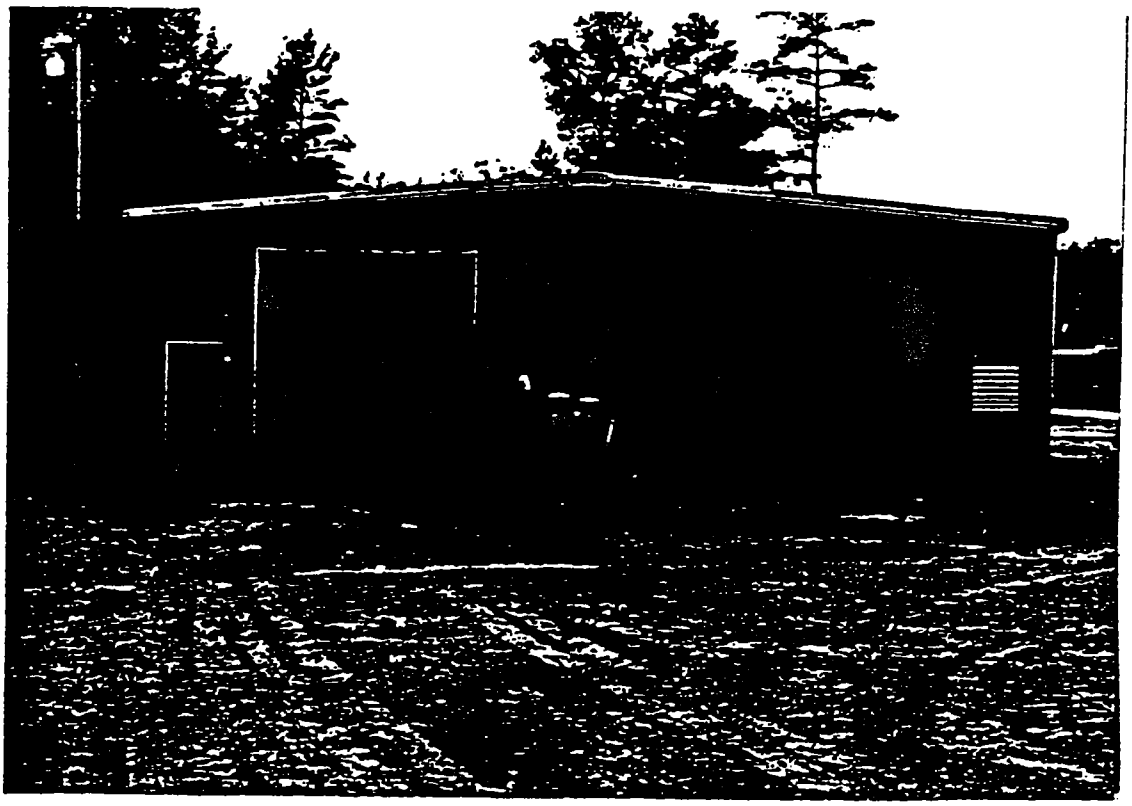
Model B-1082









W-TRACK

BELPAR ENVIRONMENTAL
An AMERIQUEST Company

BELPAR ENVIRONMENTAL OF VIRGINIA, INC.
7500 HARVEST ROAD
P. O. BOX 757
HOPEWELL, VA 23860
(804) 452-1750
(804) 748-0681

October 1, 1990

SO. CHARLESTON, WV
CINCINNATI, OHIO

Department of Waste Management
11th Floor
Monroe Building
Richmond, Virginia 23219

Attn: Cynthia V. Bailey

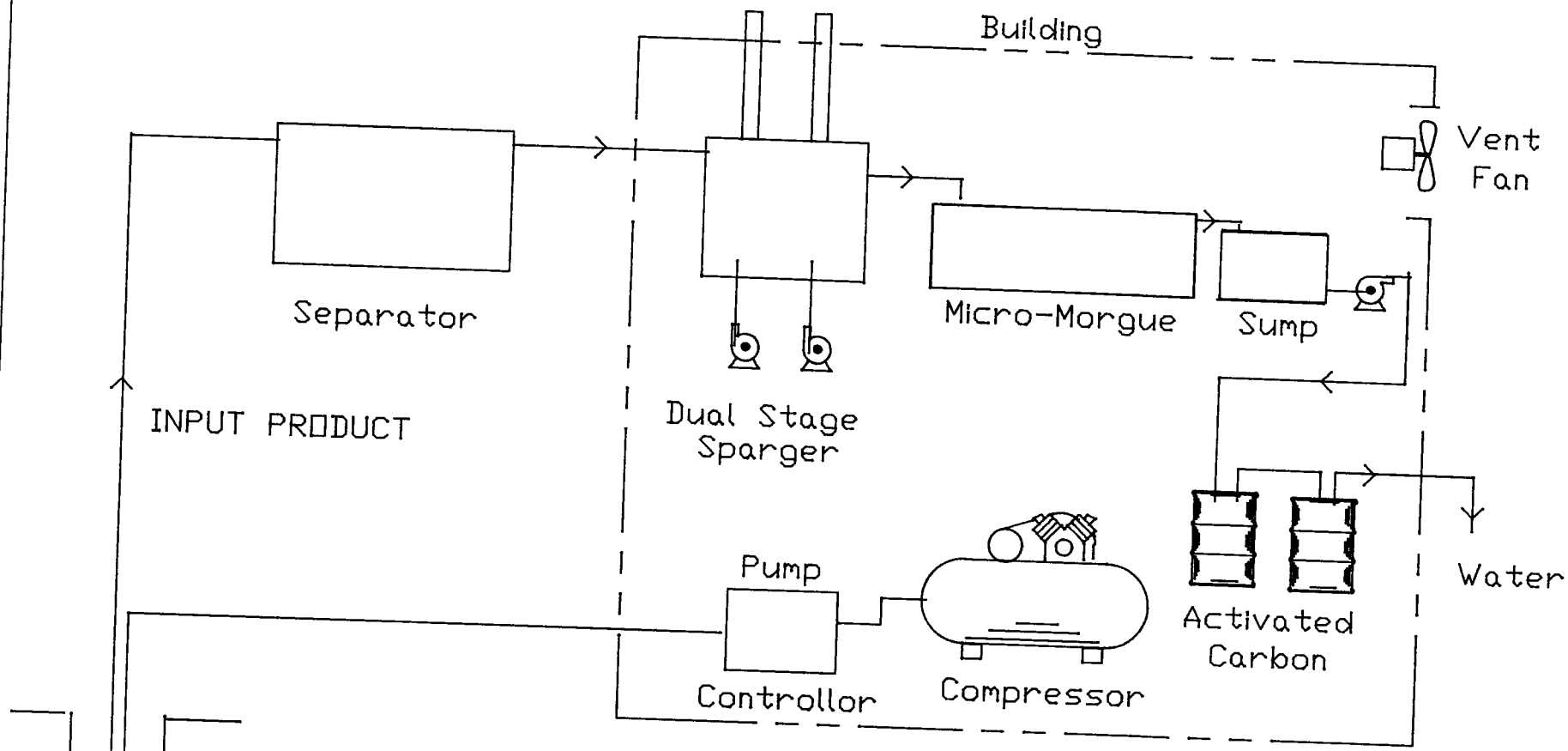
RE: Solid waste variance for petroleum recycling

Dear Ms. Bailey:

Belpar Environmental Inc. presently operates an environmental contracting and consulting firm in Prince George, Virginia. A substantial portion of our work consists of underground storage tank closures and aboveground storage tank cleanings. The by-products of these operations consist of water-contaminated petroleum products. Separator technologies reclaim the petroleum products for recovery of the economically available resources. The reclaimed petroleum products undergo further reclamation which ultimately involves re-refining at other facilities within the state of Virginia. Increasingly, these solid wastes are being classified as hazardous due the new toxicity characteristics revisions. For this reason, Belpar applied for interim status as a treatment and storage facility.

Belpar herein requests a variance from classifying as a solid waste those materials that have been reclaimed from underground and aboveground storage tank operations and which will be reclaimed further before recovery is complete. The process we operate (see attachment A) performs the first step of recycling which recovers the valuable resources contained in the wastes. This variance would allow the output product from wastes processed in this manner to be shipped by bill of lading. Otherwise, output product shipped by uniform

Attachment A

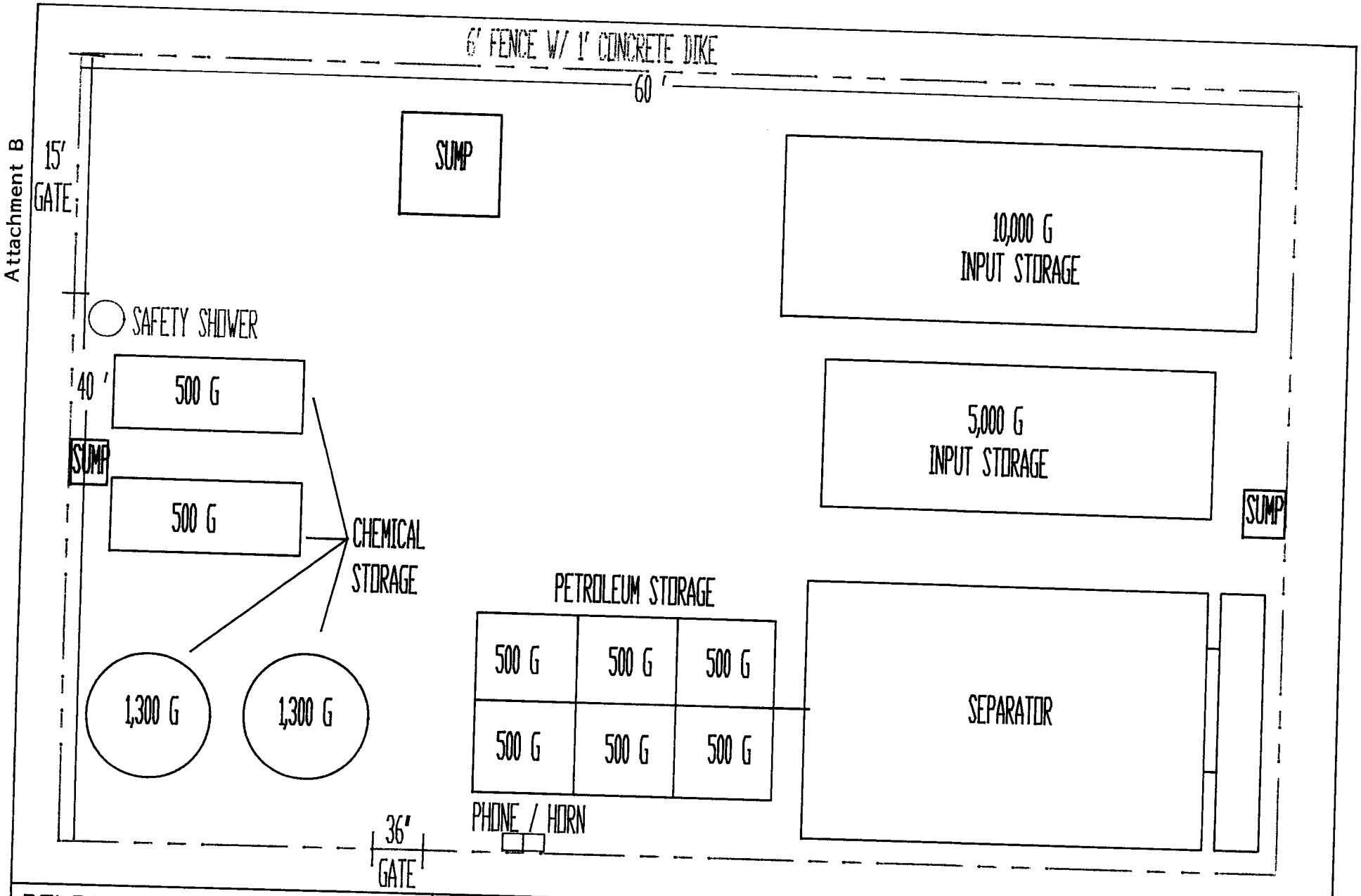


BELPAR
ENVIRONMENTAL

Product Treatment Unit

B-1053

Attachment B



BELPAR ENVIRONMENTAL, INC.
7500 Harvest Road Prince George, VA 23875
An Ameriquest Company

CLIENT:

SITE:

PROJECT NO.:	APPROVED BY:			3
DRAWING NO.:	NO.	REVISION	DATE	4
DRAWN BY:	1			5
DATE:	2			6